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ABSTRACT

This report from the Comptroller General to Congress is designed to assess the effectiveness of the Bilingual Education Program and to suggest ways to improve its administration. The program as originally conceived is described, and funding, participation, and recent legislative developments affecting bilingual education are discussed. It is stated that the program has progressed little towards its goals of (1) identifying bilingual education approaches, (2) adequately training bilingual education teachers, and (3) developing suitable instructional materials. The impact of the 1974 Education Amendments on this progress is discussed. The effect of the program on participating students, including an examination of the appropriateness of standardized tests is then outlined. Two main factors contributing to the poor performance of the target population are isolated: (1) the language of limited English-speaking children may not have been used enough in classroom instruction, and (2) there may be too many English-speaking children in project classrooms, diluting project effectiveness for target children. Inadequate monitoring and difficulty in assessing English language proficiency also constitute problems. Each section of the report is followed by GAO recommendations and by HEW comments. The appendices include a review of the characteristics of 1973-74 bilingual education projects and of parent and HEW stands on bilingual education. (CLK)

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# *REPORT TO THE CONGRESS*

## *BY THE COMPTROLLER GENERAL OF THE UNITED STATES*

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# Bilingual Education: An Unmet Need

### Office of Education

Because adequate plans were not made to carry out, evaluate, and monitor the Bilingual Education Program, the Office of Education has progressed little toward

- --identifying effective ways to provide bilingual education instruction,
- --adequately training bilingual education teachers, and
- --developing suitable teaching materials.

No comprehensive information is available on the program's effect on students' academic progress, but the Office of Education has contracted for a national evaluation on this. Local project evaluation reports have been inadequate and of little use to local and Federal decisionmakers.

U S DEPARTMENT OF HEALTH, EDUCATION & WELFARE
NATIONAL INSTITUTE OF EDUCATION

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MWD-76-25

MAY 19, 1976

COMPTROLLER GENERAL OF THE UNITED STATES
WASHINGTON, D.C. 20548

B-164031(1)

To the President of the Senate and the
Speaker of the House of Representatives

In this report we assess the effectiveness of the Bilingual Education Program and suggest ways to improve its administration. The program is administered by the Office of Education, Department of Health, Education, and Welfare.

Because the program represents the largest and most direct Federal assistance for meeting the special educational needs of limited English-speaking children, we reviewed the progress of the program in achieving its goals of (1) identifying effective bilingual education approaches, (2) adequately training bilingual education teachers, and (3) developing suitable instructional materials. We also determined the program's effect on participating students at 16 projects.

We made our review pursuant to the Budget and Accounting Act, 1921 (31 U.S.C. 53), and the Accounting and Auditing Act of 1950 (31 U.S.C. 67).

We are sending copies of this report to the Director, Office of Management and Budget, and to the Secretary of Health, Education, and Welfare.

Elmer B. Staats
Comptroller General
of the United States

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ABBREVIATIONS

| | |
|---|---|
| GAO | General Accounting Office |
| HEW | Department of Health, Education, and Welfare |
| LEA | Local education agency |
| OE | Office of Education |

COMPTROLLER GENERAL'S REPORT TO THE CONGRESS

# BILINGUAL EDUCATION: AN UNMET NEED

Department of Health, Education, and Welfare

## D I G E S T


As many as 2.5 million children in the United States primarily speak, read, and write a language other than English. They are educationally disadvantaged because they cannot understand instruction traditionally given in English. Bilingual education is designed to teach these children English and to teach them in their language so they can progress effectively through school.

Bilingual education was relatively new when the Bilingual Education Program was established in 1968. The program, administered by the Office of Education, Department of Health, Education, and Welfare (HEW), was intended to be a research and demonstration program.

Because adequate plans were not made to carry out, evaluate, and monitor the program, the Office of Education has progressed little toward

--identifying effective ways of providing bilingual education instruction (see p. 8),

--training bilingual education teachers (see p. 14), and

--developing suitable teaching materials. (See p. 18.)

To help prevent this problem from recurring, GAO suggests that the Congress establish legislative controls over future educational demonstration programs. The controls should require that Federal agencies be accountable for (1) establishing program goals, objectives, and milestones and (2) assessing the program and reporting periodically to the Congress on its progress. (See p. 29.)

The Education Amendments of 1974 established priorities and authorized funding for the Bilingual Education Program which should help the program reach its goals. The Office of Education is acting to alleviate the shortage of teachers and materials. (See p. 23.)

No comprehensive information is available on the program's effect on students' academic progress, but the Office of Education has contracted for a national evaluation on this. (See ch. 3.)

Local project evaluation reports have been inadequate and of little use to local and Federal decisionmakers. (See p. 30.) Further, it is questionable whether available testing instruments are appropriate for the target population. (See p. 33.)

On the basis of available test data, some students at 16 projects GAO sampled were making normal progress in math and reading but most were not achieving at national norms. The test data indicated that English-speaking students, who are also allowed to participate in the program, generally did better than children with limited English-speaking ability.

Because the 16 projects represent only a small fraction of all projects in the program, the results of GAO's analyses are not necessarily representative of the entire program. (See p. 34.)

Two factors may have contributed to the poorer performance of the target population.

--The language of the limited English-speaking children may not have been used enough in classroom instruction. (See p. 45.)

--Too many English-speaking children were in the project classrooms, thus diluting program services for the target children. (See p. 47.)

Inadequate monitoring by the Office of Education and the difficulty of accurately assessing

the English language proficiency of the target population also affected project effectiveness. (See p. 49.)

Project personnel believed nonacademic benefits to the students included enhanced self-image and improved attitudes toward school. Reactions of parents of participants were generally favorable. (See p. 40.)

GAO recommends that HEW:

--Formulate a plan for developing effective ways of providing bilingual education instruction. (See p. 28.)

--Take steps to improve project evaluation reports. (See p. 42.)

--Examine the appropriateness of academic testing instruments available for children with limited English-speaking ability and, if needed, take action to have better ones developed. (See p. 43.)

--Limit the number of English-speaking children allowed in the program, or use other methods to further insure that available program resources reach the largest possible portion of the target population. (See p. 52.)

--Examine the appropriateness of available testing instruments for assessing English language proficiency and, if needed, take action to have better instruments developed. (See p. 52.)

In response to GAO's recommendations, HEW said:

--The Office of Education and the National Institute of Education are formulating a plan for systematically developing effective ways of providing bilingual education instruction. (See p. 28.)

--It is revising program regulations to establish requirements which should help improve project evaluation reports. (See p. 43.) (GAO believes, however, that

stronger and expanded reporting requirements are necessary.) (See p. 44.)

--These agencies are undertaking and planning several actions to examine the appropriateness of test instruments. (See pp. 43 and 52.)

--It will review the issue of limiting the number of English-speaking children allowed in the program. (See p. 52.)

# CHAPTER 1

## INTRODUCTION

The Bilingual Education Program was established to meet the special educational needs of limited English-speaking children from low-income families. The program, authorized by title VII of the Elementary and Secondary Education Act of 1965, as amended (20 U.S.C. 880b), provides, among other things, funds to local educational agencies (LEAs) to design, develop, and implement approaches for bilingual education. The Office of Education (OE), Department of Health, Education, and Welfare (HEW), administers the program, which is the largest and which provides the most direct Federal assistance for teaching children in another language.

OE defines bilingual education as the use of English and another language as instructional mediums in an educational program. Instruction is provided in both languages in some or all subjects and the culture associated with the other language is also emphasized. Participants can also include children proficient in English as well as limited English-speaking children. Bilingual education is broader than the long-established English-as-a-second language concept which stresses English language instuction for a portion of the school day.

The concept of bilingual education was relatively untested in the United States when title VII was approved on January 2, 1968. The Congress, intending it to be a research and demonstration program, authorized grants to

--test the effectiveness of bilingual educational approaches through research or pilot projects,

--provide training for teachers in bilingual education programs,

--develop and disseminate instructional materials, and

--establish and operate bilingual educational programs.

We evaluated the progress of the Bilingual Education Program in (1) identifying effective bilingual educational approaches, (2) training teachers, and (3) developing instructional materials. We also reviewed OE's program implementation at 20 projects operating during school year 1973-74.

Sixteen projects were established at LEAs in nine States to address the special educational needs of limited English-speaking school children in those areas. At these projects we evaluated--by analyzing available test data--the academic progress of a sample of student participants. The projects were selected in consultation with OE program officials who agreed that those selected could be considered typical of the program. Because the 16 projects represent only a small fraction of all projects in the program, the results of our analyses of achievement data should not be considered necessarily representative of the entire program.

The other four projects, national in scope, were established to develop, acquire, and disseminate instructional materials and to evaluate test instruments for widespread LEA use. (The scope of our review is detailed in chapter 5.)

## PROGRAM DESIGN AND ADMINISTRATION

LEAs wishing to participate in the program submit applications to OE. To qualify for financial assistance, an applicant must demonstrate that it has school enrollments of limited English-speaking children who come from low-income families and environments where the dominant language is not English. The applicant must also show that the regular school program is not meeting the special educational needs of this group.

OE reviews and approves project applications, paying particular attention to factors such as problem significance and needs assessment, target group characteristics, project objectives and procedures, planned class activities, staff development, parental involvement, and proposed budget. In awarding grants, OE is required to consider recommendations from State educational agencies, the geographic distribution of limited English-speaking children, the relative need for bilingual education in individual States, and the ability of LEAs to provide bilingual education services.

OE headquarters (1) develops policies for program operation, funding, evaluation, and dissemination of results and (2) monitors LEA projects. OE's Office of Planning, Budgeting, and Evaluation has primary responsibility for overall program evaluation. Because program administration is centralized at OE headquarters, HEW's regional offices and the State educational agencies have not been involved in the program's administration.

OE issued program regulations in 1969 and supplemented them with program guidelines in April 1971 which contained

program philosophy; guidance for project design, implementation, and evaluation; and instructions for submitting grant applications. In June 1974 revised regulations and procedures were issued which superseded the guidelines. Title VII was amended in August 1974 by the Education Amendments of 1974 (20 U.S.C. 821) which, among other things, created the Office of Bilingual Education within OE. Revised program regulations became effective on June 24, 1975.

## FUNDING AND PARTICIPATION

Because title VII was established as a demonstration program, OE originally intended that LEAs would absorb project costs after 5 years. However, beginning in school year 1974-75 projects could be funded for longer than 5 years where exceptional potential for achieving program goals was demonstrated, but could not be funded indefinitely.

Federal funds totaling $374.9 million were appropriated for the program from its inception through fiscal year 1976.

| Fiscal year | Number of projects | Program participants | Amount appropriated |
|---|---|---|---|
| 1969 | 79 | 26,500 | $ 7,500,000 |
| 1970 | 131 | 51,900 | 21,250,000 |
| 1971 | 165 | 83,700 | 25,000,000 |
| 1972 | 210 | 106,000 | 35,000,000 |
| 1973 | 209 | 129,500 | 45,000,000 |
| 1974 | 380 | 236,000 | 58,350,000 |
| 1975 | a/381 | 268,500 | 85,000,000 |
| 1976 | - | - | 97,770,000 |
| Total | | | $374,870,000 |

a/Excludes grants to 30 universities for fellowships for study in the field of bilingual education training.

The program is forward funded; that is, funds appropriated and obligated in one year finance program operations the following year. Thus, the 209 projects shown above for fiscal year 1973 were implemented in school year 1973-74. The map on the following page shows (1) the concentration of title VII funds in school year 1973-74 and (2) that 10 States received 83.5 percent of available funds.

Twenty-four languages were represented by the 209 projects:

## STATES WITH HIGHEST PERCENTAGES OF TITLE VII FUNDS IN SCHOOL YEAR 1973–1974

Note: LEAs in all other States and territories received $5.5 million or 16.5 percent of total grant funds.

| | |
|---|---|
| --American Indian languages | 15 |
| --European languages-- French, Portuguese, Spanish | 3 |
| --Pacific Island languages-- Chamorro, Palauan, Pouapean | 3 |
| --Other languages-- Chinese, Eskimo, Russian | 3 |
| Total | 24 |

About 85 percent, or 179, of the 209 projects were directed toward Spanish-speaking children. Although prekindergarten through grade 12 are eligible for funding, the main emphasis has been on kindergarten through grade 6.

The 20 projects we reviewed received grants totaling $4.6 million for school year 1973-74. At the 16 projects providing classroom services, grants amounted to $2.2 million and over 10,000 students participated. The languages covered by these projects included Spanish (11 projects), American Indian (2 projects), Chinese, Portuguese, and French. Grants awarded to the four national projects totaled $2.4 million.

In school year 1974-75, the number of projects increased to 383, including about 200 new projects. These projects serve an estimated 236,000 students--out of a total target population ranging possibly from 1.8 to 2.5 million children--and encompass 42 languages, including 23 American Indian languages.

## RECENT DEVELOPMENTS AFFECTING BILINGUAL EDUCATION

Since title VII was enacted, bilingual education programs and related activites have grown substantially at all government levels. For example, several States have legislation establishing programs to meet the special educational needs of limited English-speaking children. Of the nine States we reviewed, six--Arizona, California, Massachusetts, New Mexico, New York, and Texas--have such laws. Indications are that this trend will continue and will have a major impact on the direction of existing programs.

On January 21, 1974, the Supreme Court ruled that, in Lau v. Nichols, 414 U.S. 563 (1974), public school systems must rectify the educational problems of limited

English-speaking children. The decision was reached on behalf of Chinese children against an LEA in San Francisco. The Court based its ruling on title VI of the Civil Rights Act of 1964 (42 U.S.C. 2000d) and held that a school system receiving Federal funds unlawfully discriminates against limited English-speaking children if it fails to cope with their language problems. Under such circumstances, children are denied an equal opportunity to participate in the educational program. As a result of this decision, more LEAs will probably begin bilingual education programs.

The Education Amendments of 1974 extend the bilingual education program through fiscal year 1978 and considerably increase authorized program funding. The amendments also are expected to have a significant impact on program operations. This is discussed in chapter 2.

## CHAPTER 2

## RESOURCES TO EXPAND BILINGUAL EDUCATION HAVE NOT BEEN DEVELOPED

Through projects funded under the Bilingual Education Program, local educational agencies have attempted to meet the educational needs of school-age children with limited English-speaking ability. However, OE did not establish an adequate management plan to implement, evaluate, and monitor the program. Consequently, OE's overall goal of developing resources to effectively expand bilingual education has not been met.

--Only four effective bilingual educational approaches have been identified.

--Some bilingual education teachers have been trained, but a critical shortage of adequately trained teachers still exists and not enough training facilities are available to provide appropriate training.

--Some progress has been made in developing Spanish-language instructional materials; however, more materials are needed, particularly in other languages.

It will be extremely difficult to effectively expand bilingual education until these resources are sufficiently developed. These resources are critical because, as previously discussed, LEAs will probably be starting new bilingual programs as a result of recent court decisions. The Education Amendments of 1974 mandate several activities which should help alleviate the shortage of resources and OE has taken certain actions, accordingly.

### PROGRAM GOALS AND OE DATA ON GOAL ATTAINMENT

The Congress and OE recognized that, because bilingual education was relatively new, certain resources had to be developed before extensive programs could be established to reach all children of limited English-speaking ability. Accordingly, the program goal has been to develop these resources--effective bilingual education approaches, adequately trained bilingual education teachers, and suitable teaching materials. The effect on program participants is discussed in chapter 3.

OE has relied primarily on annual internal evaluations and LEA project evaluation reports to determine whether the goals have been achieved. However, neither method has yielded comprehensive, useful data on program effectiveness.

OE's Office of Planning, Budgeting, and Evaluation prepares a status report for the Congress on the progress of all OE-funded education programs. In its fiscal year 1974 report, OE stated that:

> "In general * * * it would appear that title VII has succeeded as a demonstration in that, however informally, interest has been generated and models are being replicated."

The portion of the report concerning bilingual education was based on a program evaluation made for OE by a private firm. It showed that many title VII projects are visited by personnel from other LEAs. Of 34 projects included in the study, 31 had been visited and 10 had been at least partially replicated (duplicated) by 1 or more LEAs.

OE's annual report lacked information on the progress made in training bilingual education teachers and in developing instructional materials. The contractor's final report, dated December 1973, acknowledged the existence of severe shortages in both areas but did not provide perspective regarding national needs or ongoing efforts to find appropriate solutions.

## LITTLE PROGRESS MADE IN IDENTIFYING EFFECTIVE BILINGUAL EDUCATIONAL APPROACHES

Although the program is in its seventh year of furnishing classroom services to limited English-speaking children, OE has made little progress in identifying effective bilingual educational approaches. As of December 1975, only four approaches had been identified.

### Characteristics of bilingual educational approaches

According to OE, bilingual educational approaches have several common elements: instructional design, evaluation, staff training, materials acquisition and development, and community participation. Each element contains variables which can be structured to form a different approach.

To illustrate, in terms of instructional design LEAs are concerned with variables such as classroom mix of limited English-speaking and English-speaking students, percentage of time each language will be used, and emphasis each subject will be given, including the sequential pattern of teaching subjects at various grade levels. Another consideration is which instructional technique to employ--team-teaching,

small group instruction, individual tutoring, or some other technique or combination of techniques. Instructional design also encompasses personnel resources which can implement the classroom approach. Examples include:

--A bilingual aide assisting a monolingual English-speaking teacher.

--A bilingual teacher and bilingual teacher aide instructing small groups of students alternately in the two languages.

--A bilingual teacher exchanging students with a monolingual English-speaking teacher to provide instruction in two languages.

Procedures are also necessary for evaluating the implementation of the instructional design. An evaluation design should consider processes and products to be measured, measurement instruments or techniques to be applied, data collection and analysis procedures to be used, and reporting format. Selecting appropriate measurement instruments or techniques is important. Some alternatives, for example, are standardized achievement tests, teacher-developed tests and rating scales, classroom observations, and questionnaires.

OE's efforts to identify approaches

In the program's first year, OE received over 300 LEA applications for bilingual education projects. Seventy-nine were awarded grants and became operational in school year 1969-70. Differences in school resources and organization, as well as in community composition, resulted in the use of various approaches to implement the projects.

Although many and varied approaches were carried out, OE had little control over which approaches would be evaluated and compared, how it should be done, and for how long. As previously discussed, the Congress intended the program to test the effectiveness of bilingual education approaches through research or pilot projects. Because OE had little control, the program lacked the characteristics of a demonstration program. In its fiscal year 1971 status report to the Congress, dated January 1972, OE stated that:

"During its three years of operation, the Bilingual Education Program has become more and more of an educational service program, rather than a demonstration one."

OE created a task force in 1971 to determine whether bilingual education should be expanded from a demonstration to an educational service program. In October 1971 the task force reported that evidence on the effectiveness of bilingual education projects was inconclusive. Among other things, it recommended that OE play a stronger program role by further directing developmental activities and initiating a "planned variation" component. Such a component would identify effective bilingual education strategies by systematically evaluating different approaches. The task force explained its position by stating:

> "It is recommended that 'planned variations' of bilingual models should be tried out systematically. Some of the most promising models worked out by the various projects should be tried out in a more systematic way. The development of such models is a difficult task and should begin at once. It may be well to stage these trial runs in areas which presently have no bilingual program so that the Office of Education may specify which model shall be tried out. All the schools chosen to participate in the new planned variation part of the program would be subject to an intensive, common evaluation for the purpose of determining which models are the most effective."

These recommendations were not implemented. According to HEW officials, a "planned variation" study design was developed under a 1972 research grant costing about $300,000. However, the design was not implemented because of several concerns, including cost and OE's ability to control the experiment at each LEA.

OE did not establish objectives and milestones to identify educational approaches for LEA use until 5 years after the Congress first appropriated program funds. In fiscal year 1971, HEW established the Operational Planning System to help management with resource allocations. Among other things, the system is intended to insure that long-range goals are accomplished. It requires HEW activities to develop clear, measurable objectives indicating what each program plans to accomplish in terms of output or impact and to set milestones to measure effectiveness in achieving objectives.

In fiscal year 1974, 3 years after the HEW system was established, OE developed an objective and milestones designed to insure that effective bilingual educational approaches were validated and disseminated. OE's fiscal year 1974 objective stated that 10 effective title VII approaches

would be available for dissemination to LEAs by June 30, 1974. Significant milestones were:

--By March 1974, prepare criteria for identifying effective bilingual and bicultural educational approaches and list title VII projects deemed worthy of further examination.

--By April 1974, make visits to identified projects to validate evaluation and programmatic data.

--By May 1974, submit information on effective title VII projects to OE's Dissemination Review Panel 1/ for approval.

Fifteen projects were identified as having potential for LEAs to replicate. Each project was visited for no more than 2 days by OE validation teams to collect project data and verify its accuracy and reliability. An OE official told us that the 15 projects were selected subjectively by program personnel from 38 fifth-year projects recommended for school year 1974-75 funding. Of the 15 projects, only 4 were submitted to the Dissemination Review Panel for approval. But, in September 1974, the panel disapproved the projects because each lacked objective data on the participants' academic achievement.

In June 1974 OE awarded a contract estimated at $1.1 million for an overall evaluation of the Bilingual Education Program. One objective was to identify up to 10 exemplary projects. OE's Office of Planning, Budgeting, and Evaluation and the contractor cooperatively defined minimum criteria for screening candidate projects. To be considered, projects had to

--include English-language instruction for children with limited English skills,

--provide academic instruction in the language of the target population,

--address the customs and cultural history of the target population,

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1/In April 1974 the Assistant Secretary for Education changed the panel to a joint National Institute of Education and OE Dissemination Review Panel. It is responsible for reviewing and approving all educational products and materials proposed for public dissemination.

--have significant gains in English-language skills as well as content areas taught in the native language,

--have definable and describable instructional and management components, and

--have reasonable startup and continuation costs.

A total of 175 candidate projects were selected, most of which were funded under title VII. As a result of a telephone screening, 59 1/ projects were dropped without requesting evaluation reports because they did not meet the minimum criteria. An additional 20 projects could not be considered because the requested evaluation reports were not received.

The evaluation reports of the remaining 96 projects were analyzed for information on their success or failure. The evaluation methodology of 89 of the projects was found to be so inadequate that a conclusion on the project's success or failure could not be drawn. The contractor's report, dated August 1974, stated that:

> "Some of the more common shortcomings encountered in reviewing evaluation designs were the following: insufficient or inappropriate comparative data, small numbers of participants and/or control students, unanalyzed data, data reported for one grade level only, inappropriate testing procedures, and failure to collect, in addition to data from language tests, data from tests in other subject areas. In a few instances, program documents supplied little or no information on cognitive achievement of participants."

The remaining seven projects were recommended to the Dissemination Review Panel as exemplary bilingual education projects. The panel approved four of the projects for dissemination. These projects, all funded under title VII, are identified below.

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1/In a few instances calls were made as a result of false leads and no special program for limited English-speaking students was operating. Also, some programs were dropped at their own request.

| Program title | Location | Language |
|---|---|---|
| St. John Valley Bilingual Education Program | Madawaska, Maine | French |
| Alice Independent School District Bilingual Education Program | Alice, Texas | Spanish |
| Aprendemos en Dos Idiomas, Title VII Bilingual Project | Corpus Christi, Texas | Spanish |
| Bilingual Education Program | Houston, Texas | Spanish |

Program descriptions detailing the content and key characteristics of the four projects were prepared by the contractor. OE officials told us that the descriptions will be made available through the title VII program to LEAs seeking ideas on program design in fiscal year 1976. In addition, OE has awarded a contract to prepare "Project Information Packages" on the projects. The packages will go beyond the program descriptions by detailing the project processes and by showing LEAs how to implement the design in its entirety.

OE officials told us the project information packages are scheduled to be completed by the summer of 1976. They said that tentative plans call for a 2-year field test of the packages and, if the field tests are successful, the packages will be disseminated on a widespread basis to LEAs.

## OE efforts to identify and validate successful approaches needs redirection

Although OE has identified four approaches which have shown effective results and have the potential for replication, it needs to formulate a systematic plan to develop such approaches. As stated earlier, for the title VII candidate projects included in the contractor's study, OE had little input into the design and development of particular projects.

Title VII grants are awarded on the basis of the extent to which basic funding criteria are met. The particular approach or strategy to be implemented is primarily left up to the discretion of the grantee. OE does not have a plan for testing particular approaches which are likely to work or particular variables which are believed to have impact on project effectiveness.

Also of particular concern are the inadequacies of the evaluation designs developed and implemented at local projects. In commenting on the few models that have been identified, the August 1975 report stated that:

"Practically every study of this type over the years from several research organizations and across a variety of educational programs, including compensatory education, reading programs and now bilingual education, has pointed to poor experimental design, to the lack of planning for evaluation, to inappropriate use of statistical methods, and to a general lack of evidence one way or the other."

Consequently, although title VII projects have implemented a wide variety of approaches for providing bilingual instruction, their evaluation designs have been so inadequate as to preclude the project's data from even being considered by OE's Dissemination Review Panel. It would seem, therefore, that strong evaluation designs should be an intrinsic part of demonstration projects to provide greater assurance that reliable data on project effectiveness will be available. Chapter 3 discusses in more detail LEA evaluations.

## INSUFFICIENT SUPPLY OF BILINGUAL EDUCATION TEACHERS

Objective evidence is lacking on whether students perform better because they have been taught by a bilingual education teacher. Nevertheless, educators and OE officials agree that additional qualified teachers are needed.

In March 1974 we reported to the Congress that a national surplus of elementary and secondary school teachers existed, but there were shortages in some subjects and in certain localities. 1/ Little progress has been made in filling the bilingual education teacher shortage and OE has not quantified this need. Progress in training teachers has been hampered because (1) the capability of colleges and universities to provide the necessary training has been limited and (2) previous Federal teacher training programs have not been successful in meeting the teacher shortage need. The following three sections include a discussion of OE's progress in these areas before enactment of the Education Amendments of 1974.

### Teacher shortage has not been quantified

Although estimates have been made, OE has not adequately determined how many additional bilingual education teachers

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1/"Supply and Demand Conditions for Teachers and Implications for Federal Programs," B-164031(1), March 6, 1974.

are needed to serve the target population. A major factor affecting estimates of teacher need is the size of the target student population; however, OE has not made a comprehensive study of this population. OE also lacks comprehensive information on State and LEA qualification standards for bilingual education teachers and on how many teachers meet such qualifications.

In recent years, estimates of the target population have ranged from 1.8 to 7 million nationwide, and the corresponding estimated teacher need has varied accordingly. One reason for the wide variance is that the language characteristics of children needing bilingual education have not been well defined. (See ch. 4.)

In March 1974 OE estimated that about 1.8 to 2.5 million children needed bilingual education and, using a classroom student-teacher ratio of 30 to 1, estimated that the number of teachers needed would range from 60,000 to 83,000. However, the estimate is inadequate because it was based on a sample of only four States, on 1970 census data on homes where foreign languages were spoken, and on a 1972 survey of national ethnic origin of minorities made by HEW's Office for Civil Rights. Educators generally recognize that such data does not accurately measure a child's ability to function in English.

Although nationwide estimates have varied significantly and generally have been inadequate, there is evidence that additional bilingual education teachers are needed. For example, at the projects we reviewed, 292 teachers provided instruction to project participants. Of these teachers 200, or 69 percent, were bilingual--fluent in and able to understand English and the target students' native language. However, at five projects the majority of the teachers were not bilingual. Also, only 74, or 27 percent, of the 271 teachers for whom information was available had received college training to teach in bilingual classrooms. Most LEA project directors told us the shortage of qualified teachers adversely affected their projects, including the quality of instruction.

A 1973 OE-financed study of 34 Spanish projects, which were not included in our review, resulted in similar findings. The contractor's report concluded that:

> "All teachers employed in the * * * projects were certified. However, not all these teachers were qualified to teach in a bilingual education program. Consequently, there is a lack of formally trained and bilingually qualified teachers to instruct in bilingual education programs. The lack is impacting on * * * project success."

The LEAs included in the OE study considered 370, or about 73 percent, of the 510 teachers to be qualified to teach subjects such as language arts, history, science, and math in Spanish.

Initial OE program guidelines specified that project teachers should have certain qualifications and competencies, including (1) bilingual capability, (2) training and teaching experience, using the language of the target population as a medium of instruction, (3) training and experience in teaching English as a second language, and (4) an awareness of the target students' culture. We requested information on teacher qualifications for the nine States covered in our review. Of the seven States that responded, five State educational agencies--Arizona, California, Massachusetts, New Mexico, and Texas--had established bilingual education teacher certification standards. The standards and the requirements to meet them varied, although four States stressed bilingualism, culture, and instruction methods. Of the 16 LEAs we reviewed, 11 had established minimum standards, but project officials were generally unaware of State standards.

Training programs of colleges

OE has not comprehensively assessed the ability of colleges to train students to be bilingual education teachers nor does it have comprehensive data on the number of students with bilingual capability who are enrolled in colleges and majoring in teacher education. Using questionnaires, we surveyed colleges in the nine States we reviewed to ascertain their training capabilities in this field. Although several offered courses related to bilingual education, few had comprehensive training programs or offered degrees and credentials in bilingual education.

OE officials believe that not enough colleges are capable of training bilingual education teachers to meet current needs. In October 1974, using information available within OE and other HEW agencies, OE identified 101 colleges in 15 States and the District of Columbia as having an established program or some training activity in bilingual education. OE's data showed that 47 offered degrees and 51 offered courses related to bilingual education; specific information on the remaining 3 institutions was not given. Of the 51 institutions offering courses, 17 offered only English-as-a-second language training. Information regarding degree requirements was not provided.

The National Council for Accreditation of Teacher Education is the national agency for accrediting programs that prepare elementary and secondary education school teachers

and school service personnel. We sent questionnaires to the 112 colleges accredited by the Council in the 9 States we reviewed. Of the 91 institutions responding 78, or about 86 percent, indicated a need for bilingual education teacher training programs in their area. However, only 23 institutions said they offered degrees or credentials related to bilingual education; 46 said they had courses related to bilingual education. A breakdown of the questionnaire responses is shown below.

| State | Need for training programs | | Offer degrees or credentials | | Offered courses (note a) | |
|---|---|---|---|---|---|---|
| | Yes | No | Yes | No | Yes | No |
| Arizona | 2 | 0 | 1 | 1 | 1 | 0 |
| California | 18 | 0 | 8 | 10 | 8 | 2 |
| Colorado | 5 | 1 | 1 | 5 | 5 | 0 |
| Louisiana | 2 | 4 | 1 | 5 | 1 | 4 |
| Massachusetts | 14 | 0 | 1 | 13 | 9 | 4 |
| Montana | 2 | 1 | 0 | 3 | 3 | 0 |
| New Mexico | 4 | 0 | 3 | 1 | 1 | 0 |
| New York | 13 | 5 | 5 | 13 | 5 | 8 |
| Texas | 18 | 2 | 3 | 17 | 13 | 4 |
| Total | 78 | 13 | 23 | 68 | 46 | 22 |
| Percent | 86 | 14 | 25 | 75 | 68 | 32 |

a/Represents the 68 colleges not offering degrees or credentials in bilingual education.

The training programs established by the institutions offering degrees or credentials are relatively new; many were formulated as recently as 1973 and 1974. Statistics provided by 19 of these institutions indicated that 882 persons had received degrees or credentials in bilingual education, while 1,098 were still participating in the programs. Institutions not having comprehensive training programs indicated that the main factors impeding their development were limited financial resources and lack of experienced professors.

## Federally financed bilingual education training programs

Federal support for training bilingual education teachers is provided under several legislative authorities, the most significant being title VII of the Elementary and Secondary Education Act. The Education Professions Development Act (20 U.S.C. 1091) enacted June 29, 1967, and the Emergency School Aid Act (20 U.S.C. 1601) enacted June 23, 1972, also

provide for teacher training programs. The accomplishments of these programs are difficult to measure because sufficient information is not readily available on the nature and extent of the training. Our March 1974 report on teacher supply and demand noted that agencies lacked adequate information about the effects of Federal programs on teacher supply.

Training provided under title VII has increased the teaching capability of individuals at LEA projects, but has done little to fulfill apparent national needs. The original legislation made grants available to colleges applying jointly with one or more LEAs. The law did not provide for scholarships or fellowships for individuals wanting to pursue a bilingual education teaching career or direct grants to colleges. Grant funds could be used for providing (1) preservice training to prepare teachers, teacher aides, or other ancillary educational personnel, such as counselors, for participation in bilingual education programs and (2) inservice training and development programs to enable these persons to improve their qualifications while in such programs.

Preservice training generally involves a basic orientation concerning program goals and approaches and is usually offered immediately before the school year begins. Inservice training is given at various times throughout the school year and includes instruction in the methods of teaching certain subjects and on how to use teaching materials. Both types of training vary according to LEA needs.

According to OE information, the estimated funds spent in school years 1972-73 and 1973-74 by title VII projects for training and the number of teachers and teacher aides receiving training have been as follows:

| School year | Funds spent | Receiving training | |
|---|---|---|---|
| | | Teachers | Teacher aides |
| | (millions) | | |
| 1972-73 | $5.1 | 3,692 | 2,592 |
| 1973-74 | 5.3 | 3,700 | 2,600 |

## PROGRESS MADE IN DEVELOPING SUITABLE INSTRUCTIONAL MATERIALS

Shortages of suitable instructional materials have hindered program success. OE has attempted to alleviate this problem by funding three national projects to develop, acquire, and disseminate instructional material and by suggesting that each local project have a materials development

component. Some progress has been made, particularly regarding Spanish-language materials. However, more effort is needed to insure that LEAs have access to the quality material necessary to provide limited English-speaking children with meaningful education opportunities.

More instructional materials needed

The lack of sufficient bilingual instructional materials is generally acknowledged by OE, as well as local educators. For example, in hearings before the Senate Appropriations Committee in May 1974, an OE official said "* * * we know that there needs to be a substantial increase in the kind of instructional materials which can be used in bilingual education."

At only four projects we reviewed did most of the staff believe the material was satisfactory. Overall, more than 60 percent of the project directors and teachers indicated the material was inadequate and that the lack of suitable materials had adversely affected classroom instruction and project effectiveness. The 1973 OE-sponsored study of 34 projects resulted in similar findings. The study said:

> "Of 34 projects queried, only one project reported being totally satisfied with existing bilingual education materials. In 33 projects, the general consensus was that additional bilingual/bicultural materials are needed in all areas of instructions * * *. Staff members in all 34 projects indicated that the inadequate * * * materials had been a constraining factor in the conduct of their activities. Most projects were attempting to tap multiple sources of materials without really impacting on the materials problem."

Project teachers and directors we interviewed said the biggest need was for a systematic, sequential pattern of instruction in the other language; that is, a complete language arts curricula. Without access to such a curricula, teachers must develop or adapt material themselves. However, as the OE-sponsored study revealed, teachers who developed their own material did so based on their own needs, instead of developing an integrated curricula which could be used by other LEAs.

The most acute material needs were experienced by the non-Spanish projects. For example, the two Indian projects we reviewed do not have a written language. Consequently, one LEA delayed implementing its project because time was

consumed developing a dictionary and other materials. The Chinese project reviewed obtained some material from Hong Kong and another title VII Chinese project. The teachers claimed that an inordinate amount of their time is spent developing or adapting materials for project participants.

One reason for this situation is that the national projects are oriented toward the Spanish speaking. For example, one national project responsible for disseminating materials has published none in French, Chinese, Portuguese, or any of the Indian languages, although it has disseminated information on certain manuscripts which are available in these languages. Officials at four of the five non-Spanish projects we reviewed said they had never tapped the national projects for instructional material.

Local projects' efforts to fill material shortages

Initial program guidelines suggested that LEAs acquire, adopt, and develop material. The 16 projects we reviewed spent $240,000 on these activities in school year 1973-74. Most projects gave this component a relatively low priority. For example, 11 allocated 10 percent or less of their title VII budgets to material development, with 8 allocating less than 5 percent.

Projects used various methods to provide students with materials. Some materials were acquired from the national centers, some were adapted from commercial sources, and others were developed by teachers and aides. Seven projects employed curriculum specialists to assist in this effort. Although most material adapted or developed was supplementary, there were a few notable exceptions. For instance, 1 project completed 14 texts covering subjects such as social studies and language arts.

Development, acquisition, and dissemination of materials by national projects

OE has funded three national projects specifically to provide LEAs with the material necessary to implement bilingual education programs. Progress by these projects has been limited, but encouraging in some areas. The projects are identified below.

| Project and location | Fiscal year started | Cumulative funding (note a) | Purpose |
|---|---|---|---|
| | | (millions) | |
| Spanish Curricula Development Center, Miami, Fla. | 1970 | $2.6 | To develop curricula to support primary level grades (1-3) in Spanish-English bilingual education programs. |
| Materials Acquisition Project, San Diego, Calif. | 1970 | $2.0 | To locate and disseminate Spanish and Portuguese instructional materials published in foreign countries for elementary and secondary grades. |
| Dissemination Center for Bilingual-Bicultural Education, Austin, Tex. | 1972 | $0.6 | To serve as a clearinghouse for bilingual/bicultural materials and services relevant to title VII projects. |

a/Through fiscal year 1974.

Following is a discussion of the progress made by these three projects, primarily before enactment of the Education Amendments of 1974.

Spanish Curricula Development Center

To determine LEA needs, the Center made a survey and found that curricula was desired in five subjects: language arts, social science, fine arts, math/science, and Spanish-as-a-second language. The material for each subject, including texts, teachers' guides, and test instruments, is developed by Center personnel and sent to selected LEAs for field testing and comment. The Center then revises the material to correspond to the dialects and cultural characteristics of the three target populations (Mexican, Puerto Rican, and Cuban) and sends it to the Dissemination Center for Bilingual-Bicultural Education.

As of December 1975, the material for grades one and two had been field tested, revised, and sent to the Dissemination Center. The material for grade three had been field tested and revised, and the material for grade four was being field tested. According to Dissemination Center records, 52, or 38 percent, of 137 title VII Spanish-English projects which cover first grade had purchased some material as of August 1974.

The Development Center's effectiveness has at times been difficult to assess, primarily because of peak and low periods relative to receiving teacher feedback. In school year 1973-74, teachers at 40 Spanish-English projects were testing the material in their classrooms. According to the Center's 1973-74 annual report, teachers expressed a "generally positive attitude" toward the material. However, Center officials were disappointed that half the teachers provided no input and that many evaluations were not of sufficient quality to improve the materials. For school year 1974-75, to improve feedback, a Center official told us that the Center contracted with teachers to field test materials.

During school year 1973-74, the Center attempted to assess the effectiveness of the first grade language arts material. A test developed by the Center and keyed to the material's objectives was administered twice during a 5-month interval to 216 students at 3 different sites. Two groups of students were tested. One group participated in bilingual classes using material from various sources and the other group used only Center material. Test results showed that the group using Center material had gains about 32 percent higher than the other group.

Materials Acquisition Project

As of June 1975, Project personnel accumulated an inventory of over 36,000 items of instructional material. The Project uses various activities to place material in bilingual classrooms. For example, teachers from participating LEAs select material from the inventory and evaluate it, determining whether the material is appropriate for title VII participants and, if not, indicating necessary revisions.

During fiscal years 1972-74, 26, 106, and 129 bilingual education projects, respectively, received material. In school year 1973-74 the projects filled purchase orders valued at more than $300,000. Numerous workshops and meetings have been conducted to help teachers use and evaluate the material, and from 1972-75 over 2,000 teachers participated.

According to the Project's 1973-74 evaluation report, it has had difficulty in obtaining enough substantive evaluations to enable it to improve existing material. Of the 12 Spanish and Portuguese projects we reviewed, 7 had obtained material from the Project and were generally satisfied with it.

Dissemination Center

The Dissemination Center evaluates instructional material submitted by title VII projects to determine whether it is worthy of dissemination to LEAs. As of December 1975, the Center had on hand manuscripts of over 1,000 unpublished materials. The Dissemination Center director estimates that only 10 to 15 percent of the material received is suitable for dissemination. Materials are rejected primarily because they (1) duplicate existing material, (2) are not universally applicable, or (3) are not developed according to generally accepted text development procedures. With few exceptions, material is not formally field tested before dissemination.

Dissemination Center records do not readily provide summary data on how many local projects submit material or on the amount of material submitted. However, our review of available records showed that 11 of the 16 projects we reviewed had submitted a total of 117 manuscripts from school years 1971-72 through 1973-74.

Projects purchase at cost a wide variety of material, most of which is supplemental. According to a Center official, in school year 1974-75 over 191,000 items were disseminated. Thirteen of the 16 projects we reviewed received 147 pieces of material covering several subjects and grades.

As part of the Dissemination Center's 1973-74 evaluation, the evaluator requested projects to rate specific material. The response rate was very low, but those who did respond were favorably impressed. In school year 1974-75, a questionnaire sent by the Center to a number of projects showed that an overall assessment of all material being used was favorable.

## IMPACT OF EDUCATION AMENDMENTS OF 1974

The Education Amendments of 1974 mandated certain activities in an attempt to reduce bilingual education resource shortages. As a result, the Under Secretary of HEW formulated a capacity building policy for bilingual education which emphasizes teacher training and development of instructional approaches. We believe that both the revised program legislation and HEW's capacity building policy should help reduce the shortage of bilingual education resources.

Education Amendments of 1974

The Congress legislated the use of program funds to demonstrate effective ways of providing bilingual education. The legislation requires that:

> "The Commissioner * * * shall establish, publish and distribute, with respect to programs of bilingual education, suggested models with respect to pupil-teacher ratios, teacher qualifications, and other factors affecting the quality of instruction offered in such programs." (20 U.S.C. §8806-1(b))

To emphasize its concern, the Congress authorized $5 million for each fiscal year through 1978 to be used, in part, for developing effective demonstration projects. In addition, the Education Amendments of 1974 provide that:

> "The National Institute of Education shall * * * carry out a program of research in the field of bilingual education in order to enhance the effectiveness of bilingual education programs carried out under this title and other programs for persons of limited English-speaking ability. (20 U.S.C. §8806-13(a))
>
> "In order to test the effectiveness of research findings by the National Institute of Education and to demonstrate new or innovative practices, techniques, and methods for use in such bilingual education program, * * * [the National Institute of Education and OE] are authorized to make competitive contracts with public and private educational agencies, institutions, and organizations for such purpose." (20 U.S.C. §8806-13(b))

The legislation considerably expands OE's role in training bilingual education teachers. For example, the law now provides that colleges can receive direct grants or contracts and that fellowships leading to graduate degrees can be awarded to prepare individuals to train teachers for bilingual education programs. The legislation also requires OE to annually expend for training at least $16 million of the first $70 million of appropriated program funds, and at least one-third of the appropriations over $70 million. In addition, beginning in school year 1976-77 LEAs are required to expend 15 percent of their grant funds on training.

The law requires OE to provide two reports to the Congress and the President on the "condition of bilingual education in the Nation and the administration and operation" (20 U.S.C. §8806-10(c)) of title VII. The reports, due in

November of 1975 and 1977, are to include (1) a national assessment of how many teachers are needed to carry out bilingual education, (2) a description of activities to prepare teachers and other education personnel for such programs, and (3) a phased plan for training necessary personnel to expand such programs to all preschool and elementary school children.

The Education Amendments of 1974 also underscore the importance of appropriate instructional materials. The law directs OE and the National Institute of Education to "* * * develop and disseminate instructional materials and equipment suitable for use in bilingual education programs."

OE action

To assist LEAs needing bilingual education programs and to respond to the Education Amendments of 1974, OE plans to shift program emphasis from classroom services to a capacity building strategy. The strategy was outlined in a memorandum dated December 2, 1974, from the Under Secretary of HEW to the Assistant Secretary for Education (see app. II) which stated that:

> "* * * the Administration and Congress have assumed a Federal capacity building role in the area of bilingual education. This role includes such related activities as research, testing, and dissemination of educational approaches, models and techniques for teaching students with special education needs, curriculum development, teacher training, and technical assistance to States and LEAs."
>
> * * * * *
>
> "It is clearly the intent of Congress that the goal of federally-funded capacity building programs in bilingual education be to assist children of limited or non-English speaking ability to gain competency in English so that they may enjoy equal educational opportunity * * *."

In the area of teacher training, OE, in fiscal year 1975, awarded 36 institutions of higher education a total of about $3.7 million to expand their bilingual education training and development programs. Also, 30 universities have been awarded 480 fellowships for study in the field of bilingual education training with funds of about $3 million provided by OE. The fellowships are awarded to master's and doctoral candidates to help them to train others as bilingual education teachers.

In support of the planning mandate of the law to alleviate the shortage of teachers, HEW's National Center for Educational Statistics is making several surveys. Two in particular are (1) a national survey to determine the size of the target population and its English-language proficiency and (2) a survey of institutions of higher education to determine their capability to train and retrain educational personnel to work with the target population.

Data tabulation for the national population survey of 50,000 households was completed in January 1976. The Bureau of the Census, Department of Commerce, made this survey as part of its population survey. Its purpose, in part, was to obtain an estimate of the target population, as defined by the 1974 Education Amendments, by age group and by language.

The Education Amendments of 1974 define people of limited English-speaking ability as those who were born outside the United States, have a native language other than English, or come from an environment where English is not dominant and, as a result, have difficulty speaking or understanding English. A National Center for Education Statistics official said the results of the 50,000 household survey indicated that as many as 28 million people could be included in the broad category defined by the first part of the amendment. He emphasized, however, that the survey did not show how many out of this population have difficulty in English; that is, are of limited English-speaking ability. Information on the English-language proficiency of the population will be obtained by the Bureau of the Census from a second, larger scale survey for which data collection is planned to begin in the spring of 1976.

To assess the capability of colleges to train bilingual education teachers and other educational personnel, a two-phase survey of institutions of higher education has been initiated by the National Center for Education Statistics. The first phase involved sending questionnaires to about 3,000 institutions of higher education to determine which have courses to prepare or retrain teachers or other professional and nonprofessional educational personnel to work with persons of limited English-speaking ability. Those that do will be sent a second questionnaire (second phase) requesting more detailed information on the courses and programs offered.

The first questionnaires were mailed out in October 1975; as of April 8, 1976, 2,953 had been returned. According to a National Center for Education Statistics official, about 360 of the institutions will be included in the second phase of the survey. The second questionnaires will be sent to these institutions early in May 1976.

For school year 1975-76, OE funded, at about $4.7 million, nine Materials Development Centers to work on the development of a variety of needed instructional materials. In addition to Spanish, French, Portuguese, Greek, Italian, Native American, and several Asian languages will be covered. Additionally, OE has funded, at about $1.5 million, three Assessment-Dissemination Centers to evaluate the products of the Materials Development Centers.

OE did not meet the November 1, 1975, deadline for its first report to the Congress on the condition of bilingual education in the Nation and has requested that the reporting date be extended to June 30, 1976. According to an OE official, the extension was requested because the late passage of the Education Amendments of 1974 (August 1974) did not give OE enough time to prepare a meaningful report by November 1.

## CONCLUSIONS

OE has made little progress in achieving the program's goals of identifying effective educational approaches, training bilingual education teachers, and developing suitable teaching materials. This situation has adversely affected project effectiveness and exists because OE did not establish an adequate management plan to insure that the goals would be achieved. Except for the LEAs' varied approaches, the program lacks the characteristics of a demonstration program. Rather, it has taken on the characteristics of an educational service program.

OE did not formally attempt to identify approaches until fiscal year 1974 and only four approaches have been identified. The effort resulting in the identification of the four approaches was basically an attempt to identify effective approaches from a group of ongoing projects whose approaches and evaluation designs were developed autonomously and with little input from OE.

OE needs a plan to systematically develop effective educational approaches. The plan should provide for testing particular approaches which are likely to work or particular variables which are believed to have an impact on project effectiveness. It should also provide for a strong evaluation design so that there will be greater assurance that the Dissemination Review Panel will find acceptable the project's evidence of effectiveness.

Although teachers at LEA projects have received training to expand and improve their capabilities, there is a national shortage of adequately trained bilingual education teachers; however, OE has neither quantified this need nor devised a

plan to attract and train such teachers. At the same time, a general surplus of elementary and secondary education teachers exists. Alleviation of the teacher shortage has also been hampered because (1) not enough colleges have training capability in this field and (2) accomplishments of Federal training programs have been limited.

OE has made considerable progress in developing and disseminating bilingual teaching materials for Spanish-speaking students; however, little has been done to fill the material needs of projects serving children who speak other foreign languages.

The Education Amendments of 1974 and OE's program policy of capacity building should help develop necessary resources. OE has initiated action, including the necessary planning, to address the teacher shortage problem. Also, OE is working toward meeting the material needs of target languages other than Spanish.

It will be extremely difficult to effectively expand bilingual education until resources are sufficiently developed. This is critical because increased numbers of LEAs will probably start bilingual programs as a result of the Lau v. Nichols Supreme Court decision. Under the demonstration program concept, OE should have planned for resource development in the program's early stages. Because this was not done, definitive action to address the problem is only now being initiated.

RECOMMENDATION

We recommend that the Secretary, HEW, direct the Assistant Secretary for Education to formulate a plan to systematically develop effective bilingual educational approaches.

AGENCY COMMENTS

HEW, by letter dated March 19, 1976 (see app. IV), agreed with our recommendation but pointed out that, until the passage of the Education Amendments of 1974, it could not be effectively carried out. HEW said:

> "The GAO report suggests an activity which would probably be best undertaken along the lines of a 'planned variations experiment.' While we concur with this recommendation, our experience has led us to conclude that a grant-in-aid program (such as that authorized for Bilingual Education) is not an effective means for systematically developing and evaluating effective bilingual education

approaches. Generally, grant programs do not provide the front-end controls necessary to yield the results GAO is seeking. In the absence of explicit legislative authority, those controls can only be provided through contractual arrangements which, until passage of the Education Amendments of 1974, were not available.

"The Education Amendments of 1974 amended the Bilingual Education Act with the inclusion of a new Part C, Section 742. The new section authorizes a variety of contractual activities to be undertaken both individually and cooperatively by the Commissioner of Education and the Director, National Institute of Education. Given this new authority, a joint OE-NIE plan of action is being formulated for the systematic development of effective bilingual education approaches as recommended by GAO."

## MATTERS FOR CONSIDERATION BY THE CONGRESS

Bilingual education was relatively new in the United States when the program was established in 1968, and accordingly, the Congress intended that it be a demonstration program. The goals of the program were sound in that, before committing large amounts of money and attempting to serve all children needing these services, effective bilingual education approaches should first be developed. However, the program has evolved into a small service program and little progress has been made in achieving original program goals. This resulted primarily because OE did not formulate appropriate plans to carry out the legislative objective.

Consequently, the Congress may want to consider establishing legislative controls over future educational demonstration programs. The controls should require Federal agencies to be accountable for establishing appropriate goals, objectives, and milestones, as well as assessing the program and reporting periodically to the Congress on its progress.

## CHAPTER 3

## PROGRAM EFFECT ON PARTICIPATING STUDENTS

LEA project evaluation reports (1) are not designed to provide comprehensive objective evidence of the program's effect on student programs and (2) appear to be of little use to local and Federal decisionmakers. Also, many of the reports are not being submitted on a timely basis.

At the 16 projects we reviewed, some participants included in our sample were achieving at national averages in reading and math, but most were not. The gains of the English-speaking students generally surpassed those of the limited English-speaking students. The reliability of the test results, however, is questionable because the tests used were probably inappropriate for limited English-speaking children.

Project personnel believe that students have benefited through enhanced self-image, improved attitudes toward school, and increased appreciation for their native language and culture. Improvements in these areas should result in better academic achievement. Parent reaction to the program was generally favorable.

### NEED FOR IMPROVED LEA PROJECT EVALUATIONS

LEA project evaluation reports are the only source of information regarding students' academic progress and serve as the basis for identifying projects worthy of replication. These reports, however, vary in design and quality because OE had given LEAs considerable latitude in their preparation. As a result, they have been inadequate for measuring program effect on student achievement, and, as discussed in chapter 2, have been inadequate for identifying projects worthy of replication.

#### Project evaluation designs

The inadequacy of local project evaluations has been known for some time. For example, HEW's fiscal year 1974 annual evaluation report on programs administered by OE stated:

> "* * * the only current source of data concerning the program's impact on children are the annual individual project evaluation reports whose limitations in the data or methodologies prevent them from being used to draw conclusions about overall program effectiveness."

Program regulations specify that an annual evaluation should be made for each project but give the projects much latitude in the types of behavior to measure, instruments to use, data to collect, and analyses to make. Within these general considerations, projects can use whatever evaluation design they believe appropriate. The regulations require LEAs to submit reports which include reliable, valid, or other objective measurements of project success at least twice a year. LEAs can select the subjects to be tested and the tests to use.

Of the 16 projects we reviewed, 2 did not submit evaluation reports to OE for school year 1972-73. 1/ The reports of the remaining 14 projects generally:

--Included much statistical data from various tests, both standardized and project developed, which were presented in different formats making comparisons between projects difficult.

--Attempted to measure progress in achieving goals, few of which were stated in measurable terms, such as rectifying unequal education opportunities, improving reading ability, and developing self-confidence.

--Contained a minimal amount of information on the nature, strengths, and weaknesses of classroom activities.

The Congress and OE assert that the program intends eventually to make students of limited English-speaking ability proficient in English, and, in the interim, have them make normal progress in school through instruction in their dominant language. However, for school year 1973-74 project goals varied and occasionally did not address program goals.

There was often disagreement among school officials, teachers, and aides as to whether the primary program goals should be to (1) improve the students' ability in English and other basic skills such as math, (2) enhance the students' self-image, or (3) stimulate the students' awareness and understanding of the two cultures. The stated goals of some of the projects were to improve the students' confidence and self-image and to instill pride in their native culture. At six projects, the stated goals made no reference to the participants' academic achievement. Additionally, the LEAs

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1/Evaluation reports for school year 1972-73 were the most current reports available at the time of our fieldwork.

generally did not establish measurable performance objectives. The difficulties LEAs have had in assessing English language proficiency is discussed in chapter 4.

Usefulness of reports for Federal and local decisionmaking

Several sources have concluded that individual project evaluation reports have limited use for Federal and local officials. For example, an educational research laboratory studied the impact title VII project evaluation reports have on local and Federal decisionmaking. After reviewing reports from 42 projects and discussing them with program administrators at both levels, the laboratory's report, issued in 1974, concluded that the evaluations were of little use to local and national management. In another OE-financed study completed in 1973, the contractor concluded:

> "The study team could not easily assess the qualitative use of evaluation results either in planning or in day-to-day operations, because evidence of evaluation report utility was not extensively documented."

Project directors at all but three projects we reviewed expressed some displeasure with the reports. The most frequent problem was that evaluators either made no recommendations or made unrealistic recommendations that were of little use. Others said the evaluations were not comprehensive. Most teachers interviewed said (1) they either had not reviewed the reports or had not been told of their contents and (2) the project evaluators had not visited their classrooms. Consequently, not only were most project directors dissatisfied with the reports, but the teachers responsible for implementing the changes were usually unaware of the recommendations made.

Ten project directors and 10 evaluators acknowledged that OE needs to develop more specific evaluation instructions to elicit more consistent, useful evaluations. They said that evaluations would be improved if OE indicated the academic subjects to be tested, suggested which test instruments to use, and specified a format for presenting test scores.

Reports not submitted on a timely basis

In December 1974 we attempted to review project evaluation reports for school year 1973-74. At that time, however, only six projects included in our review had submitted their

reports. According to an OE official, the reports were due in July 1974, but about two-thirds of all title VII projects had not submitted them as of December.

## APPROPRIATENESS OF STANDARDIZED TESTS

OE officials said that the lack of appropriate test instruments for the target population has inhibited the collection of consistent, comprehensive achievement data. Several studies have indicated that standardized achievement tests being used by most schools were developed primarily for anglo, middle-class children and are biased against limited English-speaking children, both linguistically and culturally. Consequently, these tests may not always indicate what students learned or how they compared to national averages. Project directors and evaluators we interviewed agreed with this viewpoint.

Although this problem has been widely recognized for years, little has been done to alleviate it. OE funded a national project in 1971 to do research and develop tests to measure a child's cognitive skills; that is, skills such as reading and math. During school year 1973-74, the project completed three tests designed to measure a child's learning abilities. However, they are not achievement tests. Consequently, although these tests should help teachers and LEA project directors to determine a student's individual needs, the tests' results will not provide OE with achievement data to gauge the program's effectiveness.

## NATIONAL IMPACT STUDY

OE's contract for the national impact study is scheduled for completion in November 1976. The purpose of the study is to assess the program's effect on children's cognitive, affective, 1/ and behavioral domains. The children's progress in Spanish-English title VII schools will be compared with that of children not enrolled in the program. Achievement and other tests will be administered in school year 1975-76, enabling the contractor to analyze student development over 1 year. Reading and math tests will be given in English and Spanish. The contract also contains an option for a longitudinal analysis, but the decision to continue the evaluation over 2 or 3 years will be made at a later date.

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1/The affective domain involves changes in the feelings, emotions, values, and personality of the child.

## RESULTS OF OUR ANALYSES

At each project we randomly selected 100 English and non-English dominant participants and analyzed appropriate school records to determine their progress regarding academic achievement, attendance, grade repetition, self-image, and cultural appreciation. We also interviewed school officials, teachers, and parents to obtain their views on the projects' merits and effect on the students.

We relied on English reading and English math tests given by the LEA as part of the regular school or title VII testing program. Two analyses were made: a 1-year analysis of the students' academic achievement in school year 1973-74 and a longitudinal analysis of their progress over 2 years. We also attempted to (1) compare achievement levels of our sample with a group of nonparticipants, (2) make a 3-year longitudinal analysis, and (3) determine progress by comparing achievement levels before participation with achievement levels after participation. However, lack of control groups and test data over 3 years precluded us from making these latter analyses.

### Academic progress for 1 year

Our analysis was made to determine the (1) average achievement gain for each project, (2) number of students making normal progress, and (3) students' achievement compared to "normal" expectations for their grade levels. Raw scores from standardized tests can be converted to grade equivalent scores reflecting national norms, which are provided by the test publisher based on a nationwide sampling of students. In addition to national norms, test publishers provided "expected" scores, which indicate scores students should attain to be equal with their peers at each grade level. Publishers define normal progress as a 1-month achievement gain for each month of enrollment.

The following chart shows average gains per project made by 895 sample students in reading and 551 sample students in math. The figures represent the average gains per month, with normal progress being 1.0. Fourteen projects administered standardized tests in school year 1973-74; the tests and testing interval varied. However, data could not be obtained on the entire sample of 100 students at each project because some LEAs did not include all students in the testing program and because of student absenteeism and mobility.

Average Gains by Project (note a)

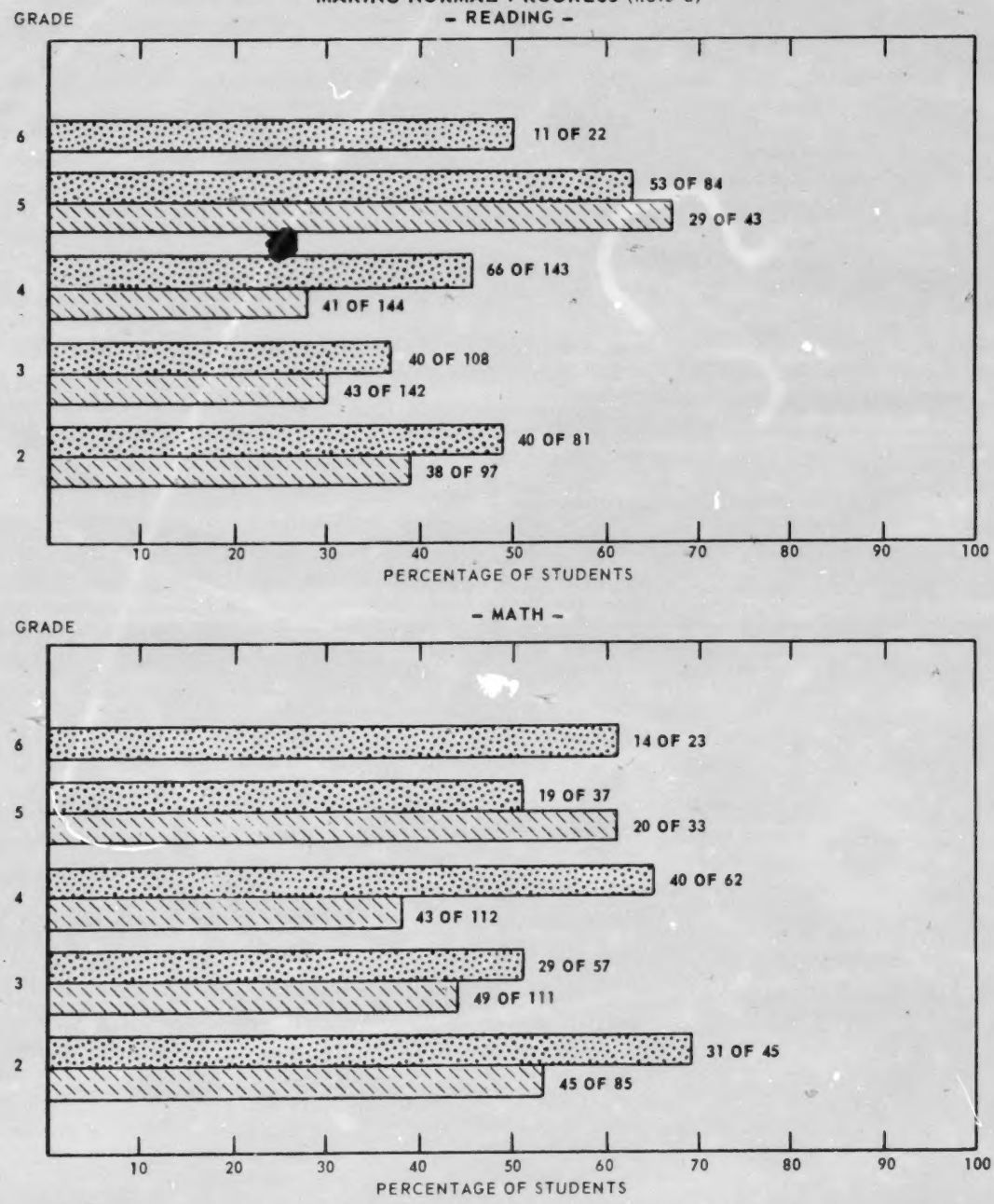
| Project | Reading | | Math | |
|---|---|---|---|---|
| | English dominant | Non-English dominant | English dominant | Non-English dominant |
| A | .4 | .6 | .9 | .6 |
| B | - | - | - | - |
| C | .8 | .9 | - | - |
| D | .5 | .7 | - | - |
| E | .9 | .5 | - | - |
| F | .5 | 1.4 | 1.2 | .8 |
| G | 1.5 | 1.3 | 1.6 | 1.4 |
| H | 1.7 | 1.9 | 1.4 | 1.4 |
| I | 1.0 | 1.0 | .6 | .8 |
| J | - | - | - | - |
| K | 1.2 | 1.1 | 1.6 | 1.0 |
| L | 1.6 | .9 | 1.6 | 1.1 |
| M | 1.3 | - | - | - |
| N | 1.2 | .5 | 1.1 | .9 |
| O | .3 | .7 | .6 | .9 |
| P | - | - | - | - |

a/Where no figures are shown, it is because either the students were not tested or the scores could not be converted to grade equivalents.

There were wide differences in reading and math achievement among the projects. At three projects (G, H, and K) both English-dominant and non-English-dominant students showed substantial progress in both subjects. However, at several other projects the students, on the average, made less than normal gains. The recorded scores at projects H and K were based on tests for grades lower than the actual grade level of the students. For example, non-English-dominant third grade students were given second grade tests. Project officials said that the lower level tests were given because they were considered more appropriate for limited English-speaking students.

We also made analyses of test data by grade level. The following graphs show the number and percentage of English-dominant and non-English-dominant students making normal progress and achieving at expected levels in both reading and math. The data represents students in our sample at all projects.

## NUMBER AND PERCENTAGE OF STUDENTS BY GRADE MAKING NORMAL PROGRESS (note a)

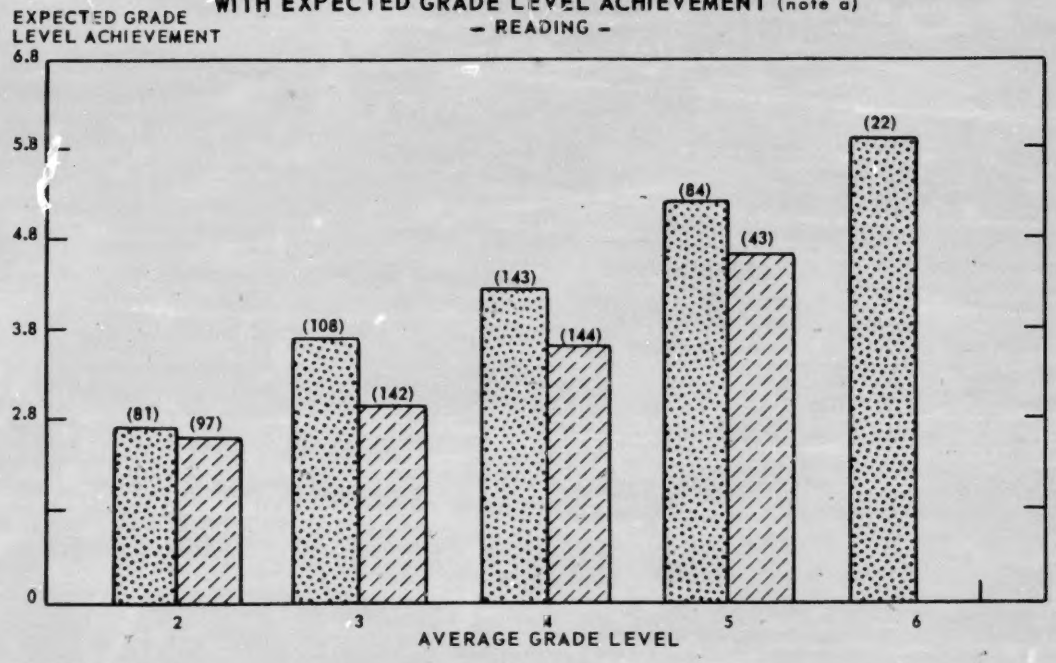


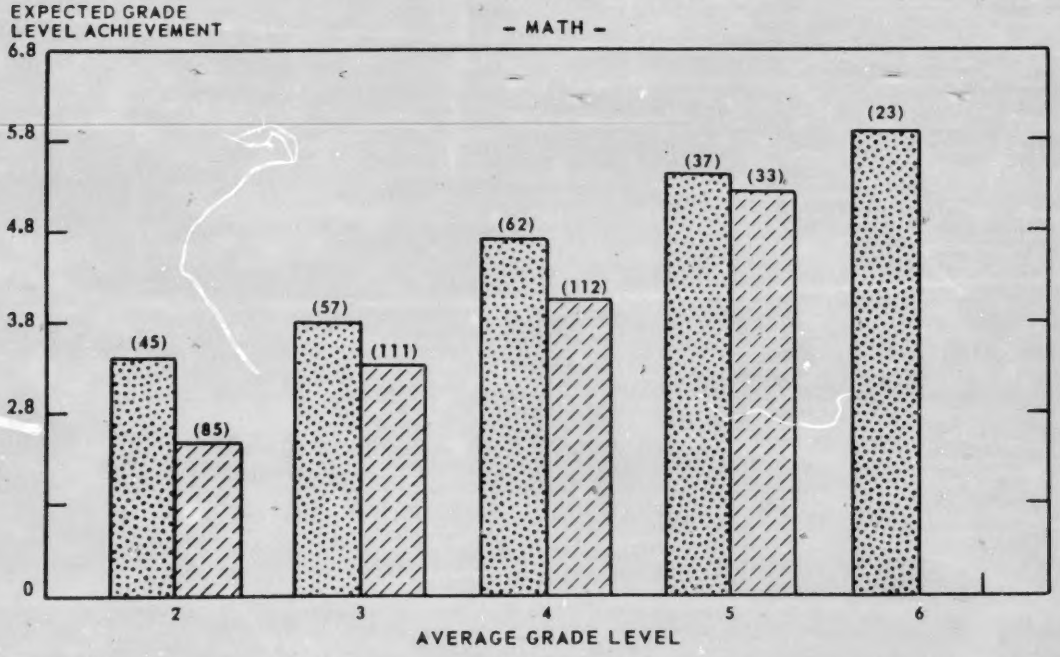

[a] Normal progress is 1 month gain in achievement for each month of enrollment. No percentages are shown for grade 1 or for limited English speaking students in grade 6 due to the limited amount of data available.

ENGLISH-SPEAKING STUDENTS

LIMITED ENGLISH-SPEAKING STUDENTS

## COMPARISON OF AVERAGE GRADE LEVEL WITH EXPECTED GRADE LEVEL ACHIEVEMENT (note a)




[a] The figures represent average scores on school year 1973–1974 post tests usually given in May 1974. Number of students is shown in parenthesis. Expected grade levels reflect nationwide average on such tests. No scores are shown for grade 1 or for limited English speaking students in grade 6 due to the limited amount of data available.

ENGLISH-SPEAKING STUDENTS

LIMITED ENGLISH-SPEAKING STUDENTS

The major findings of these analyses are:

--Overall, about half of the English-dominant students (343 of 662) made at least normal progress in both reading and math. Only one-third of the non-English dominant students (151 of 426) progressed normally in reading and less than half (157 of 341) made normal progress in math.

--The gains of the English-dominant students generally exceeded those of the non-English-dominant students in both reading and math.

--Both groups generally fell further behind expected grade levels in the higher grades.

We could not conclusively identify the variables which explain the difference in student achievement at the projects. However, several factors, such as questionable classroom approaches and shortage of bilingual education teachers, seem to affect the scores. (See ch. 4.) For example, at project A only 6 of 18 project teachers were bilingual and the non-English-dominant students received their classroom instruction primarily in English. Project D did not have sufficient instructional material which caused lower quality classroom instruction according to project officials. Another factor precluding identification of variables affecting project success was that a wide range of tests were used.

Of the 16 projects, G, which evidenced higher than normal test scores, perhaps had done most to marshal the resources needed to implement effective programs. For example, it (1) extensively used Spanish Curricula Development Center material, (2) had a full complement of bilingual teachers and teachers aides, (3) had a strong staff development component, (4) had clearly established goals and objectives, and (5) appeared to be well managed.

We reviewed school year 1973-74 project evaluation reports to compare our analyses of student achievement with that reported by the LEAs. Only six projects we reviewed had submitted annual evaluation reports. Of the six, only two reported test data which adequately indicated the academic achievement of the participants. One project showed that, on the average, target children were progressing at rates higher than English-dominant children. The other project showed that, generally, the non-English-dominant children were not doing as well as the English dominants.

## Longitudinal achievement analyses

Longitudinal analyses enable the evaluator to measure a student's progress continuously for periods over 1 year, rather than only at the end of each year. Unfortunately, such analyses are inhibited by two factors. First, students frequently do not remain in one LEA for more than 1 or 2 years. We were able to obtain longitudinal reading test data on 396 students and math test data on 276. Second, if LEAs change tests from year-to-year, comparison of test scores becomes extremely difficult.

The problem of comparing scores from different tests can be partially resolved by using the results of the Anchor Test Study. This study, performed under an OE contract and completed in September 1974, resulted in new grade equivalent norms for eight commonly used reading tests for students in grades 4, 5, and 6. Appropriately, this allows for test scores to be compared among all eight tests in these grades.

The chart below shows the results of our longitudinal analysis of students who made normal progress or better during school years 1972-73 and 1973-74.

Number and Percentage of Students Making Normal Progress or Better

READING

| Grade | English dominant Number | English dominant Percent | Other dominant Number | Other dominant Percent |
|---|---|---|---|---|
| 2 | 2 | 67 | 5 | 24 |
| 3 | 23 | 40 | 22 | 27 |
| 4 | 33 | 38 | 28 | 35 |
| 5 | 22 | 59 | 7 | 50 |
| 6 | 5 | 63 | 5 | 71 |
| Total | 85 | 45 | 67 | 33 |

MATH

| Grade | English dominant Number | English dominant Percent | Other dominant Number | Other dominant Percent |
|---|---|---|---|---|
| 2 | 0 | 0 | 6 | 32 |
| 3 | 20 | 47 | 17 | 30 |
| 4 | 24 | 69 | 18 | 32 |
| 5 | 24 | 56 | 5 | 56 |
| 6 | 5 | 71 | 5 | 93 |
| Total | 73 | 57 | 51 | 35 |

The analysis showed that 85, or 45 percent, of 191 English-dominant students and 67, or 33 percent, of 205 non-English-dominant students made normal reading progress or better. In math, 73, or 57 percent, of 129 English-dominant students and 51, or 35 percent, of 147 non-English-dominant students achieved at least normal progress. Thus, gains made by English-dominant students on the average were better than those of non-English-dominant students. Also, a comparison of the longitudinal results with the 1-year analysis shows that students generally did not achieve as high a rate of growth over the 2-year period as they did in 1 year. OE officials said that regression of this nature is common in all compensatory or remedial educational programs.

At each of the 16 projects, we interviewed 20 parents for a total of 320. The parents were asked how they thought the program had affected their children's ability to (1) speak English, (2) write English, and (3) learn mathematics. The responses were favorable; 86, 75, and 80 percent, respectively, said they were satisfied with their child's progress. The parents of English-dominant students were somewhat less satisfied than parents of the limited English-speaking children. Detailed parent responses are shown in appendix III.

Other indicators of program impact

Although OE officials consider academic growth to be the primary indicator of program success, they believe success should also be predicated on four other indices--changes in the students' self-image, cultural understanding, attendance, and grade repetition.

The vast majority of teachers and aides we interviewed said that the program has had a positive impact on students' self-image and cultural understanding because the students felt more comfortable using their native language. However, little objective evidence, such as tests, questionnaires, or surveys, was available to support this contention. About 65 percent of the parents interviewed believed that their children's attitude toward school had improved since beginning the program, and 60 percent felt attitudes of their children in the project were better than the attitudes of their nonparticipating children.

During school years 1971-72 through 1973-74, the attendance of students in our sample improved at five projects, worsened at one, and remained the same at three. Three-year attendance data was unavailable at the other seven projects. Students' attendance was better than school or LEA averages

in seven cases, worse in one, and about the same in four LEAs. Because of the lack of this data and because several factors can influence attendance, we could not conclude whether the program has had a positive influence on students' attendance.

Grade repetition data for sample students was available at 12 of the 16 projects. At seven projects less than 5 percent of the students had to repeat a grade and at the other five the retention rate varied from about 7 to 36 percent. At four of the five LEAs which computed grade repetition averages, sample students compared favorably to nonparticipants. However, many LEAs retained students only under exceptional circumstances. Thus, our data is inconclusive because the incidence of grade repetition can be more a function of LEA policy than a reflection of program impact.

## CONCLUSIONS

OE does not know whether the program is meeting the special educational needs of the target population because LEA evaluations are not designed to provide comprehensive objective evidence of the program's effect on participants. Further, the test instruments being used by most schools for the target population are not an accurate indicator of acadmeic progress because they are probably biased against limited English-speaking children, both linguistically and culturally.

LEA project evaluation reports are the only source of data on students' academic progress. However, because OE has given LEAs considerable latitude in developing evaluation designs and preparing evaluation reports, their usefulness for assessing overall program impact is extremely limited; the variances in quality and content are great. Also, as discussed in chapter 2, poor evaluation designs have seriously hampered OE's progress in identifying effective bilingual educational approaches for dissemination. OE needs to take action to strengthen the evaluation designs used by LEAs and the corresponding evaluation reports.

Timely evaluation reports are basic to effective Federal and local level management so that adjustments affecting project implementation can be made. Evaluation reports, however, are not being prepared on a timely basis. Many projects were well into the following year of funding but still had not submitted evaluation reports for the preceding school year. OE needs to aggressively implement the program requirement that LEAs submit evaluation reports on a timely basis.

The national impact evaluation currently being done under contract for OE may provide useful information of the program's effect on participants. However, the study does not negate the need for an improved management information system which would routinely provide OE with data necessary to periodically evaluate the program and to increase the likelihood of identifying projects worthy of dissemination.

At the 16 projects we reviewed, the target children were receiving educational services and benefits that they otherwise might not have received. Available test scores indicated that some program participants made normal progress in reading and math, but most students did not achieve at rates comparable to national averages. However, as previously stated, the reliability of the test results is questionable because the test instruments used are probably inappropriate for limited English-speaking children. OE needs to make a concerted effort to identify and, if necessary, develop appropriate testing instruments. No objective evidence was available, but project personnel believe program participants have enhanced self-images, improved attitudes toward school, and increased appreciation for their dominant language and culture.

RECOMMENDATIONS

We recommend that the Secretary, HEW, direct OE to:

--Require LEAs to establish (1) specific project goals consistent with the intent of title VII and (2) clear, measurable performance objectives to achieve the goals. To be consistent with program intent, project goals and objectives should address the levels of progress desired for the participants in English proficiency and academic achievement in both English and the other language.

--Expand and improve the OE management information system so program managers have uniform, consistent data needed to evaluate and manage the program. The expanded system should be designed to provide the data to assess the effectiveness of the program and each title VII project. To accomplish the needed improvements, program regulations should be revised to specify minimum requirements for LEA evaluations, including (1) reporting format, (2) academic subjects to be evaluated, (3) analyses to be made, and (4) an external standard, such as a control group, for comparison purposes.

--Take steps to aggressively implement the program requirement that LEAs submit evaluation reports on a timely basis.

--Examine the appropriateness of testing instruments available for children with limited English-speaking ability and, if needed, take action to have better ones developed at the earliest possible date.

## AGENCY COMMENTS AND OUR EVALUATION

HEW concurred in our recommendations and said that:

--The draft program regulations (published for comment in the Federal Register on April 8, 1976) require that an applicant's evaluation design include provisions for (1) assessing the applicant's progress in achieving the objectives set out in its application and (2) comparing the performance of participating children on tests of reading skills in English and in the language other than English to be used in the proposed program.

--To improve its management information system, the draft regulations require that program participants be tested in reading skills in two languages, that their performance be compared with control data, and that such comparisons include tests of statistical significance. A reporting format will be suggested to the project directors and OE's Office of Bilingual Education will extract data from individual project reports to determine total program effectiveness.

--Projects will be notified of the requirement to submit evaluation reports in writing at least 3 weeks before the deadline date. If this procedure is not productive, additional followup will be made by OE program officers. Further, projects funded over more than 1 year must submit periodic evaluation reports as a condition for funding beyond the first year.

--Draft program regulations establish a network of OE support services specifically directed toward identifying appropriate instruments for measuring the educational performance of children with limited English-speaking ability and assessing the need for such instruments and their appropriate use in bilingual education programs. In close coordination with OE, the National Institute of Education is supporting the development of assessment instruments for reading

in Spanish and in fiscal year 1976 will support a critical analysis of existing instruments across different languages, content areas, and grade levels. This analysis will assist in identifying areas where new instrument development is needed.

The action proposed by HEW should help to improve the usefulness of its management information system in assessing overall program impact on student achievement. We believe, however, that stronger and expanded reporting requirements will be needed to provide uniform information on the program goals established by the Congress.

The legislation states that a "program of bilingual education" means a program of instruction which (1) provides for the study of English and (2) allows a child to progress effectively through the educational system. To achieve the latter goal, the legislation states that such instruction shall be given, to the extent necessary, in the native language of the limited English-speaking children with appreciation for their cultural heritage. The legislation further elaborates that instruction at the elementary school level shall be given in the native language, to the extent necessary, in all courses or subjects of study with the exception of art, music, and physical education.

The proposed program regulations require that projects evaluate participants' reading performance both in English and in their native language. These results, although certainly important, fall significantly short of obtaining results on the total program of instruction that is mandated by the legislation.

HEW said a uniform reporting format will be suggested to the projects. With this approach, it can only be hoped that projects will accept the suggestion. In view of the importance of uniform reporting in making an overall program assessment, we believe that specific reporting formats should be required and not merely suggested.

## CHAPTER 4

## FACTORS AFFECTING STUDENT ACHIEVEMENT

At the projects we reviewed there were two particular factors which might have adversely affected the academic achievement of limited English-speaking children.

--The dominant language of the limited English-speaking children might not have been used enough for classroom instruction.

--There often seemed to be too many English-speaking children in the project classrooms, thereby diluting program services for the limited English-speaking children.

Another factor adversely affecting program effectiveness is that projects are having difficulty in accurately assessing the English language proficiency of the target population. Additionally, OE has not adequately monitored LEAs' progress in meeting program goals.

### LANGUAGE OF LIMITED ENGLISH-SPEAKING CHILDREN NOT USED ENOUGH

In a bilingual education program, a child's dominant language should be used enough to allow effective progress through school. Nine projects we reviewed were providing instruction in the dominant language of the target population less than 30 percent of the time. Average reading and math scores for the children in these projects were somewhat lower than those of similar students who received more instruction in their dominant language at the other seven projects.

The legislation characterizes a bilingual educational program as having three key ingredients: (1) instruction in, and study of, the English language, (2) use of the "other" language to teach all subjects necessary for effective school progress, and (3) instruction in the child's cultural heritage. Implementing such a program entails providing instruction in the dominant language to the extent necessary until the child can be taught in English.

Initial program guidelines, in effect during school year 1973-74, suggested that LEAs consider using any of three alternative approaches--equal time for both languages, instruction emphasizing the child's dominant language, or a strong English-as-a-second-language program. OE officials acknowledged that the latter approach should not

have been suggested. All 3 approaches were in evidence at the 16 projects we reviewed.

We observed two classes per grade level at each project to determine the instructional approach and the extent to which English and the other language were used in teaching English- and non-English-dominant students. Time spent for physical education, lunch, recess, etc., was not considered. The following table summarizes our observations, and shows that, on the average, about twice as much time was devoted to academic instruction for English-dominant students in English as was devoted to teaching academic subjects to non-English-speaking students in their dominant language. For example, fourth grade English-speaking students received 71 percent of their academic instruction in English while non-English-dominant students received only 32 percent of their academic instruction in their dominant language.

Non-English-dominant students

Instructional time spent in category

| Grade | (A) | (B) | (C) | Total |
|---|---|---|---|---|
| | ---------(percent)---------- | | | |
| K | 35 | 23 | 42 | 100 |
| 1 | 39 | 25 | 36 | 100 |
| 2 | 41 | 24 | 35 | 100 |
| 3 | 39 | 30 | 31 | 100 |
| 4 | 37 | 31 | 32 | 100 |
| 5 | 30 | 35 | 35 | 100 |
| 6 | 29 | 35 | 36 | 100 |

English-dominant students

Instructional time spent in category

| Grade | (A) | (B) | (C) | Total |
|---|---|---|---|---|
| | ---------(percent)--------- | | | |
| K | 16 | 67 | 17 | 100 |
| 1 | 16 | 74 | 10 | 100 |
| 2 | 18 | 73 | 9 | 100 |
| 3 | 19 | 73 | 8 | 100 |
| 4 | 19 | 71 | 10 | 100 |
| 5 | 15 | 65 | 20 | 100 |
| 6 | 28 | 64 | 8 | 100 |

A Second-language instruction; for example, Spanish for English-speaking students.

B Academic subjects taught in English (math, science, history, art, language arts, etc.).

C Academic subjects taught in the dominant language of the non-English-speaking students.

Some specific examples highlight the fact that non-English-speaking students do not appear to be getting enough instruction in their dominant language. Spanish-dominant kindergarten students at one project were taught in Spanish only 19 percent of the time. Second grade limited English-speaking students at another project received only 17 percent of their instruction in Spanish. Consequently, students identified on class rosters as non-English dominant, who supposedly learn better in another language, are nonetheless being taught primarily in English.

We also observed that in 9 of the 16 projects, non-English-dominant students in the majority of grades received more than 70 percent of their instruction in English and these students generally did not do as well as non-English speakers in the other 7 projects. Of the 12 projects having reading scores, non-English-speaking students at 5 of the 7 projects with the highest scores received more than 30 percent of their instruction in a language other than English. Conversely, four of five projects with the lowest reading scores provided their non-English-speaking participants' instruction in English more than 70 percent of the time. For the nine projects having math scores, three of the top four provided their non-English-speaking students more than 30 percent of their instruction in a language other than English.

Another analysis of the data shows that in reading, 209 non-English-speaking students receiving more than 30 percent dominant language instruction made an average gain of 1.03 months compared to an average gain of .88 months for 198 students receiving more English instruction. In math, the average gain for 175 non-English-speaking students receiving more dominant language instruction was 1.03 months compared to an average gain of .95 months for 177 students receiving more English instruction.

Eight of the nine project directors acknowledged that the students' dominant language was not used enough. Although various reasons were said to contribute to the problem, seven directors told us that the lack of adequately trained bilingual education teachers was a major cause. Two directors said that inadequate OE guidelines also contributed to the problem.

## NEED TO LIMIT PARTICIPATION OF ENGLISH-SPEAKING STUDENTS

Original program regulations allowed English-dominant students to participate in the program. The Education Amendments of 1974 also make this provision and state:

"A program of bilingual education may make provision for the voluntary enrollment to a limited degree therein, on a regular basis, of children whose language is English * * *. In determining eligibility to participate in such programs, priority shall be given to the children whose language is other than English." (20 U.S.C. § 8806-1(a)(4)(B))

However, neither the legislation nor the regulations specify acceptable classroom ratios of English- to non-English-dominant students; consequently, program services have been diluted.

At 10 projects we reviewed, all classes at each grade level participated in the program. The enrollments of English-dominant children ranged from 85 to 7 percent as shown below.

| Project | Grades covered | English-dominant students | | Non-English-dominant students | | Total project enrollment |
|---|---|---|---|---|---|---|
| | | Number | Percent | Number | Percent | |
| E | K-4 | 166 | 85 | 29 | 15 | 195 |
| B | K-1 | 84 | 78 | 24 | 22 | 108 |
| H | K-6 | 910 | 74 | 328 | 26 | 1,238 |
| M | K-5 | 476 | 70 | 207 | 30 | 683 |
| J | 1-4 | 119 | 63 | 69 | 37 | 188 |
| I | K-5 | 422 | 55 | 339 | 45 | 761 |
| C | K-2 | 167 | 47 | 190 | 53 | 357 |
| F | K-6 | 116 | 39 | 184 | 61 | 300 |
| N | 1-4 | 59 | 36 | 105 | 64 | 164 |
| O | K-4 | 73 | 7 | 1,000 | 93 | 1,073 |

The problem created for LEA management by serving total school populations is how to effectively assign students to project classrooms. If there are many more English-dominant participants, the effect is to spread non-English-dominant students and project resources among many classrooms, rather than concentrating program services on the neediest students.

There were many classrooms at the 10 projects which had significantly more English-dominant than non-English-dominant students. However, each project had at least two classrooms per grade level and it would have been possible to achieve high concentrations of non-English-dominant students by reducing the number of project classes. The examples below show classroom assignments for these students covering one grade level each at five projects.

Classroom

| Project | Grade level | First | | Second | | Third | | Fourth | |
|---|---|---|---|---|---|---|---|---|---|
| | | Eng. | Non-Eng. | Eng. | Non-Eng. | Eng. | Non-Eng. | Eng. | Non-Eng. |
| E | 2 | 19 | 1 | 18 | 5 | - | - | - | - |
| J | 1 | 18 | 8 | 22 | 6 | - | - | - | - |
| B | 1 | 19 | 6 | 18 | 2 | 8 | 8 | - | - |
| H | 4 | 32 | 2 | 28 | 7 | 12 | 4 | - | - |
| I | 4 | 6 | 10 | 18 | 6 | 20 | 9 | 22 | 3 |

Where small concentrations of non-English-dominant students are spread across several classrooms, an LEA should assign these students to fewer classes, but still allow some English-dominant students to participate. LEAs could then concentrate more resources--financial, human, and material--on target students, which is critical considering teacher and materials shortages. (See ch. 2.) By limiting the number of English-speaking participants in some way, OE would also achieve the most effective use of program funds. Of the 10 projects shown on page 48, 6 had fewer non-English-dominant than English-dominant students (projects B, E, H, I, J, and M) and seemingly would benefit by limiting the number of English-dominant participants.

## PROBLEMS IN DETERMINING ENGLISH LANGUAGE PROFICIENCY

The LEAs we reviewed had difficulty in assessing the English language proficiency of the target population. Proper assessments are necessary for (1) LEAs to design effective projects, (2) evaluators to properly measure project progress, and (3) OE to make well-informed funding decisions.

Three LEAs used the student's surname as an indicator, and most of the other 13 LEAs used a combination of factors, including Bureau of Census data, language the child spoke best in school, and language the parents spoke at home.

Educators generally recognize that one's surname is not an accurate language-dominance indicator. Further, OE and project officials said that many factors must be analyzed to determine a child's language dominance and that this can best be done by using some type of test or index. OE officials told us that some language proficiency tests are available, but comprehensive information on their adequacy is not.

## MONITORING ACTIVITIES

Effective project monitoring by OE is instrumental to the management process, particularly in identifying program

weaknesses, recommending solutions, and insuring compliance with program intent. OE, however, has not sufficiently monitored the program primarily because a formal monitoring system, with the necessary manpower, has not been established. Many of the problems cited earlier in this report, especially those concerning project justification and direction, might have been mitigated had OE adequately monitored local activities.

OE's monitoring efforts

OE's monitoring activities include reviewing project applications and evaluation reports, as well as making on-site visits. LEAs are responsible for managing project activities to insure proper and efficient program operation. As discussed previously, project applications and evaluation reports have not contained accurate and sufficient data to make informed decisions regarding project progress. Lacking this control, OE has had to rely on visits to LEAs to correct problems.

During fiscal years 1973 and 1974, OE had 8 program officials responsible for monitoring over 200 projects. These officials did not have adequate guidance for making monitoring visits, such as (1) frequency of visits, (2) project activities and records to review, and (3) feedback to provide project staffs. In addition, the workload of the program officials made it difficult to accomplish this function. Each official was assigned between 17 and 35 projects but they also had other duties, including negotiating budgets, preparing administrative reports, and reviewing project financial transactions. OE officials said that routine project visits could not be made.

Of the 16 projects we reviewed, 2 had been visited more than once, 9 had been visited once, and 4 had not been visited at all since their inception. No data was available for one project. Project directors said that during their visits, OE monitors reviewed project records, talked with project directors and teachers, and observed some classrooms. However, followup was not provided to insure that any observed shortcomings were corrected. Project directors believed more frequent visits would have been beneficial in strengthening their programs, particularly in the early stages of project development.

OE action to strengthen monitoring activities

For fiscal year 1975, the number of program officials responsible for monitoring projects was increased from 8 to 11, and emphasis was placed on monitoring new projects. An

OE official told us that 135 first-year projects were visited; other projects were not visited because of staffing limitations. Also, to assist project monitors, a monitoring guide was developed. The guide provides direction on such matters as (1) program areas to be covered during visits, (2) preparation of monitoring reports, and (3) preparation of letters to projects stating the project monitor's findings and recommendations.

In fiscal year 1976 the number of project monitors was increased from 11 to 14 and monitoring priorities were refined. Four basic priorities were established with the highest priority given to those projects believed to be in the greatest need of help and/or new projects which seem to have had difficulty in getting underway.

Although the number of project monitors has nearly doubled in 2 years (from 8 to 14), there also has been a corresponding increase in the number of projects to be monitored (from 209 to 380). Consequently, even though priorities have been established and a monitoring guide developed, it appears that the monitoring staff will continue to have a sizeable workload.

## CONCLUSIONS

Children of limited English-speaking ability might not be doing as well academically as English-speaking children because (1) not enough instruction is given in their dominant language and (2) too many English-speaking children are often put in bilingual education classrooms. Insufficient instruction in the dominant language of the limited English-speaking child appears to be due primarily to the lack of qualified bilingual education teachers. The presence of significant numbers of English-speaking students resulted primarily because OE did not establish limits on the number of these children allowed to participate. While there are benefits to be derived from having English-speaking children participate, their numbers should be limited in some way so that available program services are concentrated on the target population.

The LEAs had difficulty in accurately assessing the English language proficiency of the target population. Accurate assessments are needed for (1) LEAs to design effective projects, (2) evaluators to properly measure project progress, and (3) OE to make well-informed funding decisions.

The most reliable way of assessing English language proficiency appears to be through the use of a testing instrument. Some instruments are available but comprehensive

information on their adequacy is not. Available instruments should be examined for appropriateness, and action taken to have better ones developed, if necessary.

OE's project monitoring activities have been insufficient to insure appropriate program implementation. Many problems cited in this report could have been mitigated if OE had effective monitoring activities; particularly where new projects have been established. In fiscal years 1975 and 1976 OE took action which should help to strengthen project monitoring. However, it appears the gains to be realized by staff increases will be largely offset by the increased number of projects.

## RECOMMENDATIONS

We recommend that the Secretary, HEW, direct OE to:

--Establish classroom limits on the number of English-speaking participants, or use other methods which will provide added assurance that available program resources will reach the largest possible portion of the target population.

--Examine the appropriateness of available testing instruments for assessing English language proficiency and, if needed, take action to have better instruments developed.

## AGENCY COMMENTS

HEW generally agreed with our recommendations and said that:

--Through careful review of applications and increased monitoring, OE is confident that it can assure an appropriate balance among participating children. The specific question of limitations will be reviewed during the comment period on the proposed regulations.

--OE, among other things, has developed a network of support centers for bilingual education that will be identifying, collecting, reviewing, developing, and disseminating appropriate language proficiency assessment materials. Working closely with OE, the National Institute of Education in fiscal year 1976 is researching several areas, including the consistency and accuracy with which alternate assessment procedures identify children in need of bilingual programs within language groups. The findings of this investigation will be used, in part, to determine the need for developing additional assessment procedures.

## CHAPTER 5

## SCOPE OF REVIEW

We evaluated the effectiveness of the Bilingual Education Program in developing effective bilingual educational approaches, adequately trained bilingual eduation teachers, and suitable instructional materials. Also, at 16 projects we determined the program's impact in meeting the special educational needs of a sample of limited English-speaking children.

At OE headquarters in Washington, D.C., we interviewed officials responsible for administering and evaluating the program and reviewed policies, regulations, practices, and procedures established for program administration. We also examined program evaluation reports, including those prepared by OE and private firms under contract to OE.

Of the 20 projects we reviewed, 16 were implemented at LEAs to provide educational services to limited English-speaking students and 4 were established at LEAs to develop, acquire, and disseminate instructional materials and test instruments for national use. At each project we examined project applications, records, and reports, and interviewed project officials. At the 16 projects providing classroom services, we also interviewed school administrators, teachers, teachers' aides, and made classroom observations. We also analyzed test data to evaluate the academic progress being made by a selected group of students. The 16 projects were located in Arizona, California, Colorado, Louisiana, Massachusetts, Montana, New Mexico, New York, and Texas, as shown in appendix I.

We used questionnaires to obtain pertinent information from State education agencies, colleges with accredited teacher training programs, and parents of children participating in the Bilingual Education Program.

Our fieldwork was completed in the summer of 1974. Work at OE headquarters was essentially completed in the fall of 1975.

APPENDIX I

SCHOOL YEAR 1973-74 CHARACTERISTICS OF
BILINGUAL EDUCATION PROJECTS GAO REVIEWED

| | Project language | Year of operation | Grades covered | Enrollment | Federal funding |
|---|---|---|---|---|---|
| Arizona | | | | | |
| Project D | Spanish | Fifth | Pre-K thru 5 | 833 | $ 75,653 |
| California | | | | | |
| Project C | Chinese/Spanish | Third | K thru 2 | 353 | 82,717 |
| Project G | Spanish | Fifth | K thru 6 | 175 | 149,400 |
| Project H | Spanish | Fifth | K thru 8 | 1,488 | 187,484 |
| Colorado | | | | | |
| Project J | Spanish | Fourth | K thru 4 | 310 | 146,000 |
| Louisiana | | | | | |
| Project A | French | Fourth | K thru 4 | 660 | 130,000 |
| Massachusetts | | | | | |
| Project K | Portuguese | Fourth | K thru 4 | 200 | 91,669 |
| Montana | | | | | |
| Project N | Crow a/ | Fourth | K thru 4 | 175 | 168,331 |
| New Mexico | | | | | |
| Project B | Kerasan a/ | Second | K thru 4 | 206 | 88,320 |
| Project L | Spanish | Fourth | 1 thru 4 | 300 | 72,281 |
| New York | | | | | |
| Project E | Spanish | Third | Pre-K thru 4 | 297 | 127,000 |
| Project F | Spanish | Fifth | Pre-K thru 12 | 930 | 250,000 |
| Project M | Spanish | Second | K thru 5 | 746 | 180,000 |
| Texas | | | | | |
| Project I | Spanish | Fifth | K thru 6 | 2,185 | 106,695 |
| Project O | Spanish | Third | K thru 4 | 1,168 | 196,000 |
| Project P | Spanish | Fifth | K thru 4 | 700 | 110,000 |

a/American Indian languages.

APPENDIX II

# MEMORANDUM

DEPARTMENT OF HEALTH, EDUCATION, AND WELFARE
OFFICE OF THE SECRETARY
DATE: DEC. 2, 1974

TO: Assistant Secretary for Education

FROM: The Under Secretary

SUBJECT: Departmental Position on Bilingual Education

At the ASE Management Conference on October 1, 1974, I directed that OE promulgate a clear, detailed set of guidelines and clearly bring to the attention of all concerned OE employees and grantees the Federal policy for the Bilingual Education program. The basis for these guidelines was to be my testimony and that of the then Acting Director of Civil Rights before Congress in March of this year, following the Supreme Court decision on the case of Lau v. Nichols. The purpose of this memorandum is to provide OE additional guidance to facilitate preparation of the guidelines.

In its simplest terms, the Supreme Court in Lau affirmed the responsibility of Local Education Agencies (LEA's) to comply with Title VI of the 1964 Civil Rights Act, and HEW regulations and guidelines issued pursuant thereto. These guidelines and regulations require that school districts take affirmative action to rectify the language deficiencies of children of limited or non-English speaking ability in such a fashion that they may enjoy equal access to the educational opportunities provided to all other students by the school system. In its decision, the Court made clear that it is the responsibility of LEA's to develop appropriate affirmative action programs for students of limited or non-English speaking ability and that the goal of such programs is to ensure equal educational opportunity. The Federal responsibility is to ensure, under Title VI, that such programs are developed and implemented -- and, to that end, the Office of Civil Rights has markedly expanded its FY 1975 compliance program in this area.

Beyond the Federal responsibility for Civil Rights compliance/enforcement, the Administration and Congress have assumed a Federal capacity building role in the area of bilingual education. This role includes such related activities as research,

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testing, and dissemination of educational approaches, models and techniques for teaching students with special education needs, curriculum development, teacher training, and technical assistance to States and LEA's. While these activities are obviously not exclusively a Federal responsibility, and should not be, the ability of the Federal government to mount such efforts with the needs of the entire nation in mind makes it an obvious and substantial participant in such endeavors. It should be reiterated, however, that this Federal role is one of providing assistance to States and LEA's in building their capacities to address effectively the needs of limited and non-English speaking youngsters. It is not a service role which would supplant the historic State and local responsibility for funding and administering this country's education system.

The goal of this Federal capacity building effort, as is the case in Federal civil rights compliance/enforcement activities, is the provision of equal educational opportunities for all youngsters. As I have testified, the Federal government should clearly not insist, as some would seem to propose, that special language programs attempt to support the more extensive cultural interests of the various ethnic minorities in American society. The cultural pluralism of American society is one of its greatest assets, but such pluralism is a private matter of local choice, and not a proper responsibility of the Federal government. This interpretation of the goal of the Federal bilingual education program was confirmed by the Conference Report on H.R. 69 (now P.L. 93-380) which states on page 148, "The House recedes to the Senate on the definition of a 'bilingual education program' with an amendment to emphasize the conferees' concern that the new definition not be misinterpreted to indicate that an ultimate goal of the program is the establishment of a 'bilingual society'."

A frequent misunderstanding which seems to have provoked unnecessary and fruitless debate over bilingual policy is the failure to distinguish the goals of bilingual/bicultural programs from the means of achieving them. P.L. 93-380 emphasizes strongly that "a primary means by which a child learns is through the use of such child's language and cultural heritage...and that children of limited English-speaking ability benefit through the fullest utilization of multiple language and cultural resources." But the law makes it equally clear that the ultimate goal of Federal bilingual education programs is "to demonstrate effective ways of providing, for children of limited English-speaking ability, instruction designed to enable them, while using their native language, to achieve competence in the English language."

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As stated in my testimony, we would obviously like to be able to specify the exact nature of appropriate programs to provide youngsters of limited or non-English speaking ability equal access to the educational opportunities provided all other students by the school system. However, given the current state of the art in bilingual education, this specificity is neither possible nor desirable. Programs to provide competency in English for limited or non-English speaking children vary widely. They can range from special language tutoring, to separate English language instruction classes (and approaches vary widely within this category), to bilingual education, to complete bilingual/bicultural education. Intuitively, programs -- particularly for younger children -- with a strong bilingual/bicultural component would seem to be preferable from both an educational effectiveness and equal educational opportunity standpoint to those which may impart some English speaking competence but deprive the limited or non-English speaking youngster of the opportunity to advance through the school system at a grade level commensurate with his or her age, while simultaneously failing to maintain in the youngster a positive concept of his or her cultural heritage. The particular approach and content of a model necessary to achieve this result, however, has not been identified. We simply do not have firm evidence to embrace any one model to the exclusion of others.

The variations in concentration of limited or non-English speaking children in a district, the number of different languages involved, the ages of the youngsters, the degree of native language competency, and the degree of English language competency suggest that different approaches may be appropriate in different situations. In particular, the approach necessary to enable youngsters of limited or non-English speaking ability presently in the school system to attain competency in English at a grade level commensurate with their age may vary widely.

The difficulties in specifying a single method for providing equal educational opportunity to limited or non-English speaking youngsters were clearly recognized by the Congress in Title VII of P.L. 93-380. I refer specifically to Section 703, "Definitions; Regulations" which reads in part:

> The term 'program of bilingual education' means a program of instruction, designed for children of limited English speaking ability in elementary and secondary schools, in which, with respect to the years of study to which such program is applicable

APPENDIX II

> "(i) there is instruction given in, and study of, English and to the extent necessary (emphasis added) to allow a child to progress effectively through the educational system, the native language of the children of limited English speaking ability, and such instruction is given with appreciation for the cultural heritage of such children, and, with respect to elementary school instruction, such instruction shall, to the extent necessary (emphasis added), be in all courses or subjects of study which will allow a child to progress effectively through the educational system;"

This same section further specifies that "in no event shall the program be designed for the purpose of teaching a foreign language to English speaking children." It is clearly the intent of Congress that the goal of Federally-funded capacity building programs in bilingual education be to assist children of limited or non-English speaking ability to gain competency in English so that they may enjoy equal educational opportunity -- and not to require cultural pluralism.

In addition to the above definitions, Section 703 specifies that:

> "...children enrolled in a program of bilingual education shall, if graded classes are used, be placed, to the extent practicable (emphasis added), in classes with children of approximately the same age and level of educational attainment. If children of significantly varying ages or levels of educational attainment are placed in the same class, the program of bilingual education shall seek to insure that each child is provided with instruction which is appropriate for his or her level of educational attainment."

This requirement is reinforced by the stipulation that applications for bilingual funds must be developed in consultation with a representative advisory committee, and that, where appropriate, such committees include representatives of secondary school students to be served.

Given the above, it should be possible for OE to develop the guidelines for implementation of the Bilingual Education Program which I requested on October 1, 1974. Further, regulations and funding criteria for applications for bilingual demonstration projects should be consistent with those guidelines. To reiterate, both the guidelines and regulations should emphasize that the Federal capacity building role, as distinguished from the Federal

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civil rights compliance/enforcement responsibilities, is to assist SEAs and LEAs in developing effective programs to provide equal educational opportunities to all their limited or non-English speaking students. No single program is appropriate for the individual circumstances of all LEAs subject to the requirements of Title VI of the 1964 Civil Rights Act as reinforced by Lau -- and none should be specified.

I look forward to reviewing the guidelines, regulations and funding criteria, and my staff will continue to closely monitor progress in implementing Title VII of P.L. 93-380 through the OPS system, as well as other appropriate mechanisms.

Frank Carlucci

Prepared by: DOOLIN, EP, x51878, 11/22/74

APPENDIX III

## PARENTS' OPINIONS ON THE BILINGUAL EDUCATION PROGRAM

| | Parents of children who are | |
|---|---|---|
| | Limited English speakers | English speakers |
| 1. Do you believe all subjects in your children's classes should be taught in English and Spanish (or other language)? | | |
| Strongly in favor | 101 | 77 |
| Moderately in favor | 36 | 51 |
| No opinion | 5 | 6 |
| Moderately opposed | 6 | 22 |
| Strongly opposed | 6 | 9 |
| 2. Do you feel that your children's school should teach both the Anglo and Mexican (or other) cultures? | | |
| Strongly in favor | 111 | 98 |
| Moderately in favor | 37 | 55 |
| No opinion | 3 | 0 |
| Moderately opposed | 2 | 9 |
| Strongly opposed | 1 | 4 |
| 3. How satisfied or dissatisfied are you with the effect of the bilingual classes on your children's ability to speak Spanish (or other language)? | | |
| Very satisfied | 88 | 61 |
| Satisfied | 57 | 82 |
| No opinion | 8 | 9 |
| Dissatisfied | 1 | 13 |
| Very dissatisfied | 0 | 0 |

APPENDIX III

| | Parents of children who are | |
|---|---|---|
| | Limited English speakers | English speakers |
| 4. How satisfied or dissatisfied are you with the effect of the bilingual classes on your children's ability to write Spanish (or other language)? | | |
| Very satisfied | 53 | 33 |
| Satisfied | 60 | 68 |
| No opinion | 11 | 35 |
| Dissatisfied | 14 | 19 |
| Very dissatisfied | 6 | 1 |
| 5. How satisfied or dissatisfied are you with the effect of the bilingual classes on your children's ability to speak English? | | |
| Very satisfied | 71 | 64 |
| Satisfied | 64 | 76 |
| No opinion | 12 | 16 |
| Dissatisfied | 6 | 8 |
| Very dissatisfied | 1 | 1 |
| 6. How satisfied or dissatisfied are you with the effect of the bilingual classes on your children's ability to write English? | | |
| Very satisfied | 59 | 42 |
| Satisfied | 56 | 81 |
| No opinion | 20 | 20 |
| Dissatisfied | 6 | 11 |
| Very dissatisfied | 13 | 11 |

APPENDIX III

| | Parents of children who are | |
|---|---|---|
| | Limited English speakers | English speakers |
| 7. How satisfied or dissatisfied are you with the effect of the bilingual classes on your children's ability to learn arithmetic? | | |
| Very satisfied | 56 | |
| Satisfied | 74 | 45 |
| No opinion | 15 | 79 |
| Dissatisfied | 8 | 26 |
| Very dissatisfied | 1 | 14 |
| | | 0 |
| 8. How long should your children remain in the bilingual classes? | | |
| Until they can learn all subjects in both languages | 37 | |
| Throughout their school years (K-12) | | 25 |
| Other | 102 | |
| | 15 | 97 |
| | | 44 |
| 9. Would you like your children to be enrolled in the bilingual program next year? | | |
| Yes | 150 | |
| No | 3 | 152 |
| Do not care | 1 | 7 |
| | | 6 |

APPENDIX IV

DEPARTMENT OF HEALTH, EDUCATION, AND WELFARE
OFFICE OF THE SECRETARY
WASHINGTON, D.C. 20201

Mar. 19, 1976

Mr. Gregory J. Ahart
Director, Manpower and
Welfare Division
U.S. General Accounting Office
Washington, D.C. 20548

Dear Mr. Ahart:

The Secretary asked that I respond to your request for our comments on your draft report entitled, "Bilingual Education: An Unmet Need." The enclosed comments represent the tentative position of the Department and are subject to reevaluation when the final version of this report is received.

We appreciate the opportunity to comment on this draft report before its publication.

Sincerely yours,

John D. Young
Assistant Secretary, Comptroller

Enclosure

APPENDIX IV

Comments of the Department of Health, Education, and Welfare on the Comptroller General's Report to the Congress entitled, "Bilingual Education: An Unmet Need" -- August 15, 1975 B160431 (1)

GAO RECOMMENDATION

The Secretary direct the Assistant Secretary for Education to:

Formulate a plan to systematically develop effective bilingual educational approaches.

DEPARTMENT COMMENTS

We concur. The GAO report suggests an activity which would probably be best undertaken along the lines of a "planned variations experiment." While we concur with this recommendation, our experience has led us to conclude that a grant-in-aid program (such as that authorized for Bilingual Education) is not an effective means for systematically developing and evaluating effective bilingual education approaches. Generally, grant programs do not provide the front-end controls necessary to yield the results GAO is seeking. In the absence of explicit legislative authority, those controls can only be provided through contractual arrangements which, until passage of the Education Amendments of 1974, were not available.

The Education Amendments of 1974 amended the Bilingual Education Act with the inclusion of a new Part C, Section 742. The new section authorizes a variety of contractual activities to be undertaken both individually and cooperatively by the Commissioner of Education and the Director, National Institute of Education. Given this new authority, a joint OE-NIE plan of action is being formulated for the systematic development of effective bilingual education approaches as recommended by GAO.

GAO RECOMMENDATION

The Secretary direct OE to:

Require LEAs to establish (1) specific project goals consistent with the intent of Title VII and (2) clear, measurable performance objectives to achieve the goals. To be consistent with program intent, project goals and objectives should address the levels of progress desired by the participants in English proficiency and academic achievement in both English and the other language.

DEPARTMENT COMMENTS

We concur. The draft regulations contain provisions which require applicants to submit a description of the evaluation design for the

proposed project as a precondition for approval. The evaluation design must include provisions for assessing the applicant's progress in achieving the objectives set out in its application for assistance. It must also include provision for comparing the performance of participating children on tests of reading skills in English and in the language other than English to be used in the proposed program.

GAO RECOMMENDATION

The Secretary direct OE to:

Expand and improve the OE management information system so program managers have uniform, and consistent data needed to evaluate and manage the program. The expanded system should be designed to provide data to assess the effectiveness of the program and each Title VII project. To accomplish the needed improvements program regulations should be revised to specify minimum requirements for LEA evaluations, including (1) reporting format, (2) the academic subjects to be evaluated, (3) analysis to be made, and (4) an external standard, such as a control group, for comparison purposes.

DEPARTMENT COMMENTS

We concur. Draft regulations for the program require that applications for bilingual education projects include, at a minimum, provisions for assessing the applicants' progress in meeting its objectives, and specify that the evaluation design must include measurements of performance in reading skills in two languages; a description of, and the rationale for, the instrument to be used in evaluating the performance of participants in the program; and comparison of such performance with control data including appropriate tests of statistical significance. Reporting format will be suggested to the project directors. The Office of Bilingual Education will extract data from individual project reports for use in determining the effectiveness of the total program.

GAO RECOMMENDATION

The Secretary direct OE to:

Take steps to aggressively implement the program requirements that LEAs submit evaluation reports on a timely basis.

DEPARTMENT COMMENTS

We concur. The Office of Bilingual Education will notify all project directors in writing at least (3) weeks before the established requirement for the submission of the evaluation and expenditure reports and their deadline dates. This notification also includes suggested format for the reports. If this is not productive, the project directors are then contacted by telephone and again reminded of the requirements and

given new deadline dates. The project officer will provide guidance and technical assistance in developing the evaluation reports and remind the LEAs of the need to submit them on time. Regulations for multi-year funding provide for continued funding on the basis of progress in meeting program objectives; and periodic evaluation reports are necessary as a condition to subsequent funding.

GAO RECOMMENDATION

The Secretary direct OE and NIE to:

Examine the appropriateness of testing instruments available for children with limited English-speaking ability and, if needed, take the necessary action to have better ones developed at the earliest possible date.

DEPARTMENT COMMENTS

We concur. Draft program regulations establish a network of OE support services for programs of bilingual education. This network is specifically directed toward the identification of appropriate instruments for measuring the educational performance of children of limited English-speaking ability, the assessment of the need for such instruments, and their appropriate use in programs of bilingual education. In order to determine which measuring instruments are being used by project operators, the draft regulations require the applicant to provide a description of measurement instruments to be used in each project, the rationale for selecting such instruments, and procedures to be followed in their use.

In close coordination with OE's support centers and program office, the National Institute of Education is supporting the development of assessment instruments for reading in Spanish, and in FY 1976 will support a critical analysis of existing instruments used in bilingual education across different languages, content areas, and grade levels. This analysis will include instruments developed locally as well as those distributed by publishers, and will assist in identifying areas where new instrument development is needed.

GAO RECOMMENDATION

The Secretary direct OE to:

Establish classroom limits on the number of English-speaking participants, or use other methods which will provide added assurance that available program resources will reach the largest possible portion of the target population.

DEPARTMENT COMMENTS

We agree with what we understand to be the thrust of the recommendation; i.e., to ensure that limited program resources are used to benefit children of limited English-speaking ability. We recognize that the definition of a "program of bilingual education" in section 703 of the amended

Bilingual Education Act contains restrictions on the extent to which English-speaking children may participate in assisted programs. These restrictions are reflected in the draft regulations for the program which will be published for public comment. We will review the question of limitations during this comment period.

In any event, through careful review of applications and increased monitoring of projects, we are confident that we can assure an appropriate balance among participating children.

GAO RECOMMENDATION

The Secretary direct OE and NIE to:

Examine the appropriateness of available testing instruments for assessing English language proficiency and, if needed, take the necessary action to have such instruments developed.

DEPARTMENT COMMENTS

We concur. OE has developed a network of support centers for bilingual education that will be identifying, collecting, reviewing, developing and disseminating appropriate language proficiency assessment materials. Also the draft regulations require applicants to provide a description of instruments of measurement to be used in evaluating the performance of participants in the program, the rationale for selecting such instruments, and procedures to be followed in their use.

Working closely with OE program officers, NIE in FY 197[illegible] is investigating procedures used in identifying children in need of bilingual instructional programs that are based on assessment of language proficiency and preference. Research will be conducted to determine the consistency and accuracy with which alternative assessment procedures identify children in need of bilingual programs within language groups. Included in the research will be the procedures for identifying language preference designed by the Office of Civil Rights Act with respect to discrimination against limited English-speaking children (see the Lau vs. Nichols decision). The findings of this investigation will be used in part to determine the need for development of additional assessment procedures.

NIE is also supporting an investigation to identify characteristics of limited English-speaking children which predict success in instruction provided in English. Included among the student characteristics on which data will be collected are proficiency in English and in the mother tongue, and attitudes toward language use. The results of this investigation could be used to determine the skill level necessary before children can adapt to instruction in English or to develop more relevant and reliable assessment instruments.

## PRINCIPAL HEW OFFICIALS

## RESPONSIBLE FOR ACTIVITIES DISCUSSED IN THIS REPORT

| | Tenure of office | |
|---|---|---|
| | From | To |
| SECRETARY OF HEW: | | |
| David Mathews | Aug. 1975 | Present |
| Caspar W. Weinberger | Feb. 1973 | Aug. 1975 |
| Frank C. Carlucci (acting) | Jan. 1973 | Feb. 1973 |
| Elliot L. Richardson | June 1970 | Jan. 1973 |
| ASSISTANT SECRETARY FOR EDUCATION: | | |
| Virginia Y. Trotter | June 1974 | Present |
| Charles B. Saunders, Jr. (acting) | Nov. 1973 | June 1974 |
| Sidney P. Marland, Jr. | Nov. 1972 | Nov. 1973 |
| COMMISSIONER OF EDUCATION: | | |
| Terrel H. Bell | June 1974 | Present |
| John R. Ottina | Aug. 1973 | June 1974 |
| John R. Ottina (acting) | Nov. 1972 | Aug. 1973 |
| Sidney P. Marland, Jr. | Dec. 1970 | Nov. 1972 |
| Terrel H. Bell (acting) | June 1970 | Dec. 1970 |

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